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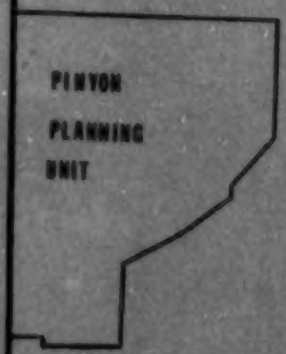
PINYON GRAZING MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

FINAL



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

I 1.98:

Dear Reader:

The Pinyon Grazing Management Environmental Impact Statement Draft (DEIS) was made available to the public on June 23, 1982 requesting public review and comment. Comments received have not resulted in the need for substantial changes in the data, analysis, or narrative in the DEIS so the entire contents have not been reprinted as part of this Final Environmental Impact Statement (FEIS). A limited number of copies of the DEIS are available on a first come-first served basis upon request to:

District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, Utah 84720

This FEIS contains information obtained during the coordination, consultation, and review of the DEIS and both responses to comments received and added information.

The vegetation production data displayed and used in this EIS were collected during the 1979 - 1980 field seasons, using accepted Bureau methods. These data were needed to help determine areas suitable for continued livestock grazing and to provide the basis for developing a rangeland management program and management alternatives. The vegetation production data have also been used to identify and analyze impacts and mitigation of the proposed action and alternatives. Reviewers of this EIS, however, should recognize the limitations of vegetation inventory data. While these data are adequate for purposes of planning and analysis, they must be supported by the results of monitoring studies before making forage allocation decisions.

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DEPARTMENT OF THE INTERIOR

FINAL

ENVIRONMENTAL IMPACT STATEMENT

ON

GRAZING MANAGEMENT

IN THE

PINYON PLANNING UNIT

UTAH

PREPARED BY

BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR

Roland Robinson

STATE DIRECTOR, UTAH STATE OFFICE

PINYON GRAZING MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

( ) Draft (X) Final Environmental Statement

Department of the Interior, Bureau of Land Management

1. Type of Action: (X) Administrative ( ) Legislative

2. Abstract: The Bureau of Land Management (BLM) proposes to implement grazing management on 1,264,250 acres of public land in Iron, Beaver, Washington, and Millard Counties in Utah. There are five alternative grazing management strategies analyzed, of which Alternative 2 - Planning Recommendations is the BLM preferred alternative. This alternative involves the implementation of intensive grazing management on 32 allotments, maintaining existing intensive management practices on 23 allotments and retaining existing custodial level management on 18 allotments. The forage resource would be managed to support existing wildlife numbers in the short term and to provide sufficient forage and quality habitat to support long-term and prior stable wildlife numbers. Wild horse numbers would be reduced from the current estimated 552 to 215, the number estimated to be present in the planning unit at the time of the passage of the Wild and Free-Roaming Horse and Burro Act of 1971. Extensive vegetation treaments and the installation of rangeland facilities such as fences, water developments, pipelines, etc. would be necessary in order to implement this alternative. Over the long term, management actions under this alternative would be expected to yield an increase in available livestock and wildlife forage from 60,757 and 2,663 animal unit months (AUMs) respectively to 88,103 and 5,407 AUMs respectively. Forage available for wild horses would be reduced from 8,345 AUMs to 3,225 AUMs and stabilized at that level.

The anticipated environmental consequences vary between alternatives, but the primary effects would be to vegetation (the availability of forage), wildlife habitat condition, wild horse numbers, and rancher income. Specific impacts would vary with degree of management proposed and the subsequent change from the existing situation.

3. Alternatives Analyzed:

   a. Continuation of Present Management (No Action)
   b. Planning Recommendations (BLM Preferred Alternative)
   c. Livestock Grazing Preference
   d. Resident Resource Values
   e. Livestock Maximization

4. Comments Have Been Requested From the Following: See List of Agencies, Organizations, and Persons to Whom Copies of the Statement are Sent.

5. Date by Which Comments Must Be Received: October 29, 1982

6. For Further Information Contact:

Morgan Jensen, District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, Utah 84720
Telephone: (801) 586-2401

7. Date Final Statement Made Available to EPA and the Public:

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COORDINATION, CONSULTATION, AND REVIEW OF THE PINYON GRAZING MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT DRAFT

The Draft was filed with the Environmental Protection Agency and made available to the public on June 23, 1982. Its availability and the time and place for public hearing were announced by the Department of Interior in the Federal Register on Monday, June 28, 1982.

August 16, 1982 was established as the end of the 60-day comment period and the deadline for receiving comments. July 28, 1982 at 7:00 p.m. was the time scheduled for the public hearing. Seven letters regarding the Draft were received during the comment period. An additional four letters were received after the comment period closed, but are included in the Final as a courtesy. No one attended the public hearing so no oral comments were received on the Draft. Substantive comments on the Draft received too late to be included in the Final will be answered directly to the commentor and both the comments and the responses will be retained in the Pinyon EIS file and will be available for public inspection.

The remainder of this document contains the following: 1) an errata sheet; 2) written comments and BLM responses; and 3) an added appendix containing allotment specific and other information not published in the Draft. All letters and comments within each respective letter were assigned an index number in the order that they were received. BLM responses are identified by the same index number and are found to the right of the comment.

ERRATA SHEET

Page 1-5.	Should read Utah Division of Wildlife Resources.
Page 2-17, Table 2-17.	The total acres to be treated should be 868,533.
Page 2-20, Table 2-20.	The acres to be treated under Alternative 5 should be 868,533.
Page 2-21, Table 2-20.	Under Alternative 3, the number of acres to be treated should be 104,555 and the number of AUMs should be 20,911.
Page 2-21, Table 2-20.	Under Alternative 4 (Wild Horses) wild horses should be allocated 11,670 AUMs in the short term and 12,825 AUMs in the long term.
Page 3-6, Table 3-2.	Total for surveyed livestock forage production (AUMs) should be 75,990. .
Page 3-11, Paragraph 5.	Should read "would require 1,353 AUMs if long-term population goals were reached."
Page 4-4, Paragraph 5.	Paper cited should be Mueggler, 1975.
Page 4-10, Table 4-2.	Note below the table should state that "information was collected during the 1979-80 SVIM inventory."
Page 4-11.	Note below table 4-3 should state "during the 1979-80 SVIM inventory."
Page 4-16.	In the first paragraph under the Significant Management Actions and Change Agents section, it should read, "that the 32 I category allotments . . ."
Page 4-21.	Short-term allocation for "M" management categories should be 28,581 AUMs.
Page 4-24.	Long-term AUMs for antelope should be 1,353.
Page 4-48.	Long-term AUMs for antelope should be 1,353.
Page 4-65, Paragraph 2.	Should read, "the grazing systems that would be proposed are 51 allotments covering over 1,146,573 acres under rest rotation systems, 11 allotments with nearly 63,183 acres under deferred rotation systems, and 54,494 acres in 11 allotments under continuous seasonal type systems."
Pages 4-65 and 4-66.	Under Impacts to Wildlife Habitat the first sentence should read "and 868,533 acres of vegetation treatments . . ."
Page LP-2.	E. Winker should be R. Wenker.

List of Commentors

1. U.S. Department of Agriculture, Forest Service
2. Humane Society of Utah
3. Utah Wool Growers
4. Wildlife Society
5. Environmental Protection Agency, Region 8.
6. Alton E. Elbridge - Watchdog
7. Five County Association of Governments

(Letters Received After the Close of the Comment Period)

8. Utah State Planning Coordinator
9. U.S. Department of the Army, Corps of Engineers
10. American Horse Protection Association
11. Jay Hunt

1

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
324 25th Street
Ogden, UT 84401

2200

JUL 14 1982

Mr. Morgan Jensen
District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, UT 84720

Dear Mr. Jensen:

The Draft EIS for the Pinyon Unit is well-written and comprehensive in scope. We concur with the preferred alternative 2. A good assessment and evaluation of tradeoffs comparing alternatives is provided in Tables 2 and 3.

As the management actions are implemented, we are hopeful they can be properly coordinated with the Dixie National Forest, where applicable.

We appreciate the opportunity to review this report.

No Comment

4

Sincerely,

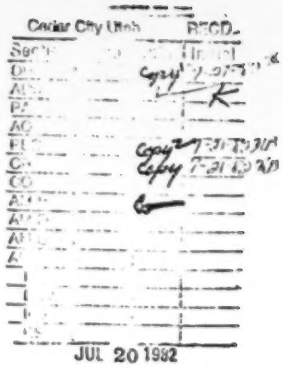
for RICHARD K. GRISWOLD
Director, Planning and Budget

6200-11 (1/80)

THE HUMANE SOCIETY OF UTAH

4613 South 4000 West
P.O. Box 20222
Salt Lake City, Utah 84120
Phone 968-3548

2



July 18, 1982

Mr. Morgan Jensen, District Manager
Bureau of Land Management
P. O. Box 724
Cedar City, Utah 84720

Dear Mr. Jensen,

I appreciate the opportunity to look over the "Pinyon Grazing Management EIS - Draft". Rather than make this letter any longer than necessary I would like to ask you to add our original comments which were contained in a letter to Mr. D. Arlen Jensen on October 28, 1981 to this letter and its comments. All of these previous questions and comments remain valid at this time.

5 In addition, I would like to address the following areas of concern:

1. I must object to the use of the terms "Stability" with regard to the livestock industry and "Consolidation" with regard to the elimination of several wild horse herds from the Pinyon Planning Unit. The term "stability" is defined as making stable; steady, or not changing or wavering. It can hardly be applied to this EIS and its alternatives for greatly increasing the livestock use within the planning unit. Utah State Department of Agriculture figures for the livestock industry (cattle) indicate that since 1974, the average percent of change for beef cattle numbers has been about 00.75%/year. This EIS is planning increases in AUMs that range from +29% to +244% of current use for livestock. This can hardly be defined as "stability"!

1

The term "consolidation" is defined as: to make solid or firm; to strengthen or unite firmly in one body or to combine. Once again the term cannot be used with regard to the total elimination of four herds within the Planning Unit and leaving two herds that will require intensive management to even survive. A better term for this type of action/alternative would be "obliterate".

2. This EIS is blatantly biased toward the livestock industry, with livestock numbers increasing in all proposed alternatives, except for #1 (No change). Balanced against these proposed increases are reductions in wild horses in all alternatives except for #4-B

2.1 While there could be substantial short-term adjustments in several of the alternatives, the objective of such change is to provide a stable base for all resources and resource users over the long term.

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and the alternative for no change.

3. 2 Population statistics for wild horse numbers in 1971, as you are well aware, are totally unreliable due to the inaccurate methods in use at that time. The use of these 1971 figures to set the favored wild horse numbers for the Unit is irresponsible and far too low.

3 The EIS makes the comment on page 3-17 that herds have increased at the average rate of 15-20% yearly. You do not state if this figure is based upon total colt production or upon survival rates throughout the Unit.

4 At the Milford Library meeting of 10-81 the total wild horse population figures were given at 465 animals. This EIS now states that the animals number 552 animals, an 18.7% increase in total numbers. To make it even more surprising over a nine-month period, the herd numbers have fluxuated even more widely: The Elsaw Wash herd has experienced a 100% growth!; The Mt. Frisco herd has experienced a 85% growth; The Tilly Creek herd has experienced a 27% growth; and The Frisco herd has experienced a 23.6% growth! These numbers can only support the inaccuracy of the population data available for this area!

4. Wildlife is also treated in a favored status, as opposed to the wild horses. While large reductions are planned for wild horses, expansion of game species are planned. Elk and Antelope numbers

5 are planned to be increased, but "prior stable" population data is non-existant for these species. It would appear that this favored status for wildlife exists due to the profitability of the animals from the "sport" they offer to hunters and the funding generated to the state from license sales. Such favoritism, at the expense of wild horses, appears questionable at least!

5. The alternatives presented, with regard to wild horses, is an all-or-nothing proposal. The least variable choices presented for wild horses range from increasing numbers from 55% to reducing their numbers 66%, with nothing in between these two figures. The +55% alternative appears to be out of the question to all livestock interests in the region and therefore not a viable alternative. This leaves proposals to reduce the wild horses from 66% to total reduction, again a no-win proposition!

2.2 BLM collected and continues to collect wild horse population data with the best inventory techniques available. Areas which contained wild horses in 1971 were documented and inventoried and while some animals may not have been counted, BLM feels that the 1971 and subsequent estimates are the most reliable data available.

2.3 The average yearly increase of 15-20 percent referred to on page 3-17 is the estimated total survival rate for wild horses throughout the unit.

2.4 Wild horse population levels of 465 discussed at the Milford meeting were subsequently updated to reflect the most current data available resulting in a total of 552. At the time of the Milford meeting wild horse numbers were being compiled and updated by herd unit and were subject to some fluctuation and change.

2.5 The elk and antelope numbers used in the draft EIS reflect both current and long-term population goals. Long-term population levels for these species were established jointly between BLM and the Utah Division of Wildlife Resources (Letter from UDWR, January 31, 1980).

6 The Society believes that BLM should re-evaluate their proposed EIS with regard to their population statistics and raise the number of wild horses to remain within the Unit consistant with those numbers that will allow for healthy herds of 30 animals or more. We

7 reject the idea of introducing "blood lines" to improve these herds. This would only lay the groundwork for finalizing the position of BLM as horse producers from surplus animals. It also goes against the original concept of manageing wild horse numbers at the minimum feasible level.

8 Alternatives that weren't presented should be examined with public comment with regard to less allocation of AUMs for livestock than have been suggested, but still allowing for reasonable growth within the area. This would allow the retention of healthy wild horse herds in the Unit and still allow expansion of livestock and time for the area to recover in some of the impacted areas of high use. With proper management of the livestock numbers and seasons of grazing; reasonable reduction of wild horse numbers; and land use management practices to enhance the forage; the Unit can handle a "balanced" use of its resources, not one tipped in favor of monetary gains only.

7

Sincerely,

John Paul Fox

John Paul Fox
Chief Investigator

cc: Mr. Russell Gaspar, esq., A.H.P.A.

2.6 The analysis performed in the EIS (Alternatives 1, 2, and 4) accounts for maintaining wild horse herds at levels which would assure healthy herds over the long term or pointed out that there would be negative impacts (Alternatives 3 and 5) to the wild horse resource.

2.7 References to the reintroduction of the Spanish Barb bloodline (pages S-4, 2-15, and 4-61) are removed from further consideration by BLM.

2.8 The alternatives presented in the EIS form a range of options from which the manager may choose to resolve specific resource problems. While an alternative with the exact specifications you desire may not have been presented, the objectives of such an alternative lie within the range analyzed and your concerns will be considered in the formulation of the final decisions.

THE HUMANE SOCIETY OF UTAH

4613 South 4000 West
P.O. Box 20222
Salt Lake City, Utah 84120
Phone 968-3548

October 28, 1981

Mr. D. Arlen Jensen, Area Manager
U. S. Bureau of Land Management
Beaver River Resource Area
444 South Main
Cedar City, Utah 84720

Dear Mr. Jensen,

I appreciate the opportunity to discuss the Pinyon Planning Unit MFP with your personnel in Milford last night. I found the information very unsettling that the Cedar City District planned to totally remove 63% (290 head) of the wild horses in the Pinyon Planning Unit, a total removal of six and one-half wild horse herd units out of the total 9 horse units in the Planning Unit!

8

9 The Society is very concerned that the Cedar City District has decided to manage wild horses in their jurisdiction at the "maximum feasible level", as opposed to the mandate of the Wild Horse and Burro Protection Act, P.L. 92-195 for "management activities ... at the minimal feasible level". The WH&BPA also designated that, " they (wild horses and burros) are to be considered in the area where presently found, as an integral part of the natural system of the public lands". I fail to see that the proposed total removal of 6½ of the 9 total wild horse units takes this into account.

No one at the Milford Library meeting was able to answer my questions regarding a clear justification for this massive removal proposal. The reasoning was given that certain areas were in a state of depletion and the livestock producer was being told to reduce his numbers 10% while the people who also show an interest in Wild and free-roaming horses are being asked to accept a management proposal which will call for a 100% reduction in 6 horse units and ½ of another.

It is the Society's feeling that should total removal be effected as proposed, should future study show that the areas could support a viable wild horse population the animals would never be allowed to make a return through conscious design by B.L.M.. Although the proposed removal plans may, in fact, be justified in the long run, there is no current body of knowledge that can be put forth to document the need for such drastic measures at this point in time.

2.9 . In proposing to allocate forage for wild horse populations in areas and at population levels defined by PL 92-195, BLM considers that its wild horse management activities are the least obstructionary to the wild and free-roaming character of the horses while still meeting BLM obligations to other resources and resource users.

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10

One point that I continue to hear is that the Wild Horse populations are "competing" with other animals with regard to forage. The Committee on Wild and Free-roaming Horses and Burros, in their report - Phase 1 Final Report on Current Knowledge and Recommended Research, states that "By most definitions, inter-specific competition is judged on the basis of two criteria (Milne 1961, Conley 1976): (1) two species compete when they both use some resource that is present in short supply; and (2) in using the resource, each species reduces the other's population performance, and ultimately fitness, to levels below what these measures would be in the absence of the other species". There has been no showing, using this criteria, of competition between either cattle and horses or wildlife and horses.

Decisions to remove total wild horse populations have not apparently been based upon any solid data to justify such measures, rather the horse has been earmarked for removal as it is by far the most politically sound. Removal or reduction of livestock or wildlife populations brings with it the wrath of the livestockman and the hunter. Both of these groups bring a much larger monetary force to bear than those representing wild horses. It would appear that the horse is being made to take the brunt of the rangeland and forage planning. Once he is removed the Bureau will then have no where else to look when additional reductions are necessary than to the very groups they are trying to forstall at present.

In conclusion, the Society feels that total removal of the 64 horse units in the Pinyon Planning Unit is a gross over-reaction to complaints of range damage and less drastic action should be considered before proposing such devastating action.

Sincerely,

John Paul Fox

John Paul Fox
Chief Investigator

2.10 Given a dietary overlap between wild horses and livestock of between 80 and 90 percent and a limited supply of forage, wild horses and livestock do in fact compete. Whether or not that competition measurably reduces the population performance of either species, it does in many instances exceed the allowable use levels of the vegetation resource (as demonstrated by the survey) and it is BLM's responsibility to manage the vegetation as well as the livestock and wild horse resources.

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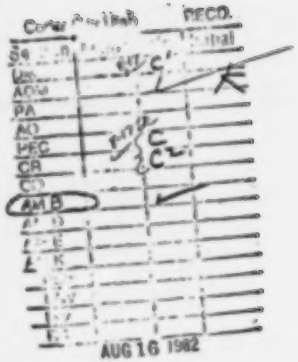

Utah Wool Growers

W WEST NO SOUTH
SUITE XXX
SALT LAKE CITY, UTAH XXXXX
TELEPHONE XXX-XXXX

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Vern Wilson
John Wrench
Malcolm Young

July 19, 1982

Mr. Morgan Jensen, District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, UT 84720

Dear Mr. Jensen:

Utah Wool Growers appreciate you submitting the draft on Pinon Grazing Management EIS.

Our observation of the draft draws numerous questions and problems that concern the livestock industry.

1 (1) We note there are 57 allotments for cattle, 9 allotments for sheep, 4 for cattle and sheep, 1 for cattle and horses and 2 unallocated. How many allocations of allotments are for wildlife?

(2) We note 3-11 Big Game, your statement Paragraph 2, "While most of the habitat has not been classified in the better categories, total deer forage availability does not appear to be a limiting factor to deer population." Are we getting the same treatment for livestock?

2 (3) Page 3-24, Paragraph 6, Importance of the Livestock Industry, "The agricultural industry does not appear to be a dominant industry, in terms of employment, in the economy of Iron County, but it is an important sector of Beaver County economy." Have you failed to recognize how those back-up industries managed to get in these counties? We question the livestock industry of Iron County as not a major factor in the economics of that county. What would you really have in Iron County if it was not for livestock and the college, and the college was originally based on agriculture?

3 (4) Chapter 4, your basis of assumption, in our opinion, is not backed by facts. Throughout Chapter 4, and other areas of the draft, we find such statements as: "Overutilization of forage by livestock is causing a decline in key forage used by mule deer," or, "Continuing current livestock stocking levels and maintaining wild horse herds at current levels are management actions which result in declines," or, "The reduction of livestock levels to survey capacity would stop overutilization of forage on 14 allotments used by antelope," or, "Adjusting livestock grazing allocations to surveyed capacity." These to us

3.1 There are proposed forage allocations for wildlife in all but four allotments. There are no proposed segregations of allotments exclusively for wildlife purposes alone.

3.2 While the livestock industry undoubtedly played a key role in the historical development of the Iron County economy it appears that in more recent years the livestock industry, and agricultural sector as a whole, have fallen in importance in terms of employment, when compared to other sectors of the local economy. Dominant sectors in Iron County employment, such as government, services, and retail trade, are indeed tied somewhat to the livestock industry but are more dependent upon the tourism and manufacturing industries and Southern Utah State College.

3.3 The quotations of the DEIS provided in your comment are all considered significant management actions affecting the wildlife resource under the respective alternatives. The Bureau of Land Management is mandated by the Federal Land Policy and Management Act of 1976 to manage public lands in accordance with the "multiple use" concept. In following this mandate it is necessary to analyze the major impacts occurring to all natural resources as a result of proposed land management plans. For impacts to socioeconomics, including impacts to ranch operations which you have mentioned, you are referred to the "Impacts to Socioeconomics" portions of Chapter 4.

as wool growers indicate a loss of income to the individuals, a reduction of tax base for the communities and counties and a general deterioration of the livestock industry at the expense of increased wildlife. Which, in turn, encroaches on the private lands owned by the livestock people and also utilizes their feed that can and should be used by the livestock man to improve his own business. Are our livestock people being forced to accept the increase in wildlife on their private property?

We have only taken a few comments from the draft to make our point that we believe the livestock people are entitled to first priorities on forage produce, that wildlife should have only second priority and that the economics of the area depends on the stabilizing effect of the livestock industry. When you remove livestock numbers you reduce the stabilizing factor for the rest of the economy. The supporting industries are of no value, nor can they operate without agriculture. What would Iron or Beaver Counties be without agriculture? Where are we to produce the food and fiber if we don't use those renewable resources for livestock?

The draft suggests livestock is the culprit. We fail to observe anywhere where wildlife is harmful in your report. Is it your attitude that wildlife does no damage? If not, why not admit it and give equal consideration. 4

There are other items, but let's maintain a current healthy livestock industry.

Sincerely,

Malcolm Young

Malcolm Young
President

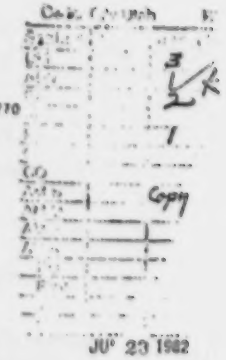
MY:ts

3.4 The BLM recognizes that some damage to both plants and the watershed may occur when wildlife populations are high. However, damage by present or long-term population levels has not and is not expected to be significant in the Pinyon Planning Unit.

BRM

4

THE WILDLIFE SOCIETY
5410 Grosvenor Lane · Bethesda, MD 20814 · Tel. (301) TWS-9770



District Manager
USDI-BLM
P.O. Box 724
Cedar City, Utah 84720

Dear Sir:

The purpose of this letter is twofold. First, I want to thank you for sending us a copy of "Pinyon Grazing Management Environmental Impact Statement Draft." We appreciate being kept informed.

Second, please note that The Wildlife Society has relocated. Future materials and correspondence should be addressed as follows:

The Wildlife Society
5410 Grosvenor Lane
Bethesda, MD 20814.

I'd appreciate it if you would please pass this information on to whoever is responsible for updating the mailing list. I have enclosed a copy of the mailing label which may be of assistance in correcting your records.

Thank you.

Sincerely,

Harry E. Hodgdon

Harry E. Hodgdon
Executive Director

HH:lhp

12

No Comment

5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295-0699

Cedar City Utah RECD

AUG 10 1982

AUG 6 1982

Ref: 8PM-EA

Mr. Morgan Jensen, District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, Utah 84720

Dear Mr. Jensen:

We have reviewed the draft Environmental Impact Statement (EIS) on Grazing Management in the Pinyon Planning Unit, Utah and would like to offer the following comments to assist you in preparation of the final EIS.

EPA appreciates the thoroughly documented discussion of the alternatives considered in the planning process and their implications from the standpoint of range management. However, we believe the EIS could be improved by the addition of a discussion of the surface water resources of the area and any water quality impacts resulting from management activities on lands in the various allotment categories. To the extent that it might provide useful information on the impacts of these management activities, BLM might also consider adding some water quality monitoring efforts to the follow-up monitoring program described in Appendix 5 of the EIS.

Since the recommended grazing plan includes prescribed burning, we also recommend that any air quality impacts of this activity be disclosed in the EIS. The Utah State Health Department's Bureau of Air Quality (801/533-6108) should also be contacted concerning the need for permits or state rules on burning.

Inclusion of the information mentioned above, together with a brief description of the federal costs of the alternative plans, are needed to enable decisionmakers to determine the tradeoffs among alternatives and establish which should be considered the environmentally preferred alternative. Based on our rating system, we have rated this EIS LO-2. This means that EPA has no objections to the proposed plan, but we do feel the document could be improved in the manner suggested by our comments. If you have any questions about our comments, please contact Mr. John M. Brink (FTS 327-4831) of my staff.

Sincerely yours,

Steven J. Durham
Regional Administrator

13

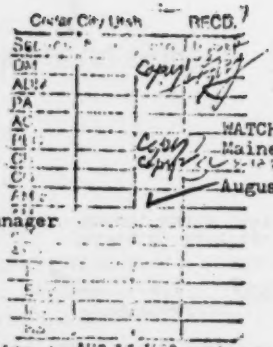
1 2 3 4

5.1 Through the public planning and scoping process and interdisciplinary analysis and review, surface water quality has been determined not to be a significant concern in the Pinyon Planning Unit. Therefore, consistent with 43 CFR 1500.4(a), (b), and (c) which mandate reduction in EIS length, preparation of analytic rather than encyclopedic EISs, and primary discussion of significant issues, surface water quality is not discussed.

5.2 The proposed monitoring program discussed in Appendix 5 of the EIS is primarily concerned with the soil and vegetation resources. A separate and ongoing program for water and watershed maintained by the District Office has provided adequate information to support the decision making process and this program will be continued with modifications as needs arise.

5.3 Vegetation treatments which would be proposed in the form of burning could cause short-term impacts. The treatments could cause immediate impacts (within a few days) on a given burn area, but they would occur periodically over several years. No burning would take place until permission would be granted by the Executive Secretary of the Utah Air Conservation Committee or his authorized representative.

5.4 Estimated costs based on recent range improvements on public lands are presented in tables 1 and 2 of Appendix 8. More detailed analysis of development and treatment costs and related benefits will be possible following further onsite evaluation and planning. Please see response to comment 6.9.



6

WATCHDOG
Maine Chapter

August 2, 1982

Morgan Jensen, District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, UT 84720

Dear Mr. Jensen:

Thank you for the opportunity to review the Pinyon Grazing Management EIS Draft. In reading through the document and comparing it with others of a similar ilk, I find that there are a number of deficiencies in the present product. While the obvious reduction in bulk, as compared with previous such EISs, is commendable, the attendant reduction in content has worked at cross purposes and rendered the document a vacuity.

14

1 As I understand it this EIS was prepared under the regulations in Federal Register, Volume 43, 1978, Part 1500 et seq. Under section 1502.2(b) your regulations specifically state, "Impacts shall be discussed in proportion to their significance." Further, under section 1500.2(b) the regulations state, "Environmental impact statements shall be concise, clear, and to the point and shall be supported by evidence that agencies have made the necessary environmental analyses." Section 1500.2(d) states, "Encourage and facilitate public involvement in decisions which affect the quality of the human environment." Clearly you have failed to meet these requirements. You have failed to display impacts at the level to which they have significance - that is, at the allotment level. You have failed to convey supporting evidence that can be scrutinized in a rational and meaningful way. And you have failed to encourage and facilitate public involvement by suppressing precisely that information that is required for intelligent and informed participation. Would you please redress these defects by publishing, as has always been done in the past, pertinent data specific to each and every allotment for all major analyses in chapters 3 and 4? Especially needed are all relevant analyses of impacts to or by vegetation, livestock, wildlife habitat, wild horses, socio-economics, treatments and developments, and monitoring.

2

In addition to the above omissions, there are a few extremely confusing and somewhat contradicting references in the document. On pages 3-2 through 3-4 you give reference to the concepts of ecological condition and ecological trend. Having struggled mightily to understand these pointedly esoteric concepts we have failed utterly to discern just how it is that you propose to put them to any conceivable gainful purpose. Do you indeed use ecological condition and ecological trend as major elements in your decision making process as is suggested in the prominence they

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6.1 It is recognized that some resource data and projected impacts such as with livestock management have significance at the allotment level while others such as for wildlife, wild horses, etc. transcend such delineations. In nearly all planning pertaining to the Pinyon Planning Unit, data collection, compilation, and analysis occurred at either the allotment level or lower and this information is open for public review in either formal planning documentation or as backup file data. Past experience with grazing management EISs, however, has shown that the preponderence of public comment and involvement has been at the program level rather than at the allotment level. Therefore, it was hoped that the format used in the Pinyon Draft EIS would facilitate rather than frustrate public involvement in and understanding of the grazing management programs in the Pinyon Planning Unit.

6.2 For more specific information pertaining to vegetation, livestock, wildlife, wild horses, and treatments and developments, refer to tables 1 through 5, Appendix 8. No allotment specific analyses exist for socioeconomics since regional and subregional data normalized to the local area through limited interviews were utilized to project socioeconomics impacts. Proposed monitoring activities within the three respective allotment categories are addressed to the extent that they exist in the text and in Appendix 5.

6.3 Currently BLM is in a period of transition from using range condition and trend exclusively to using ecological condition and trend. Because this system is still relatively new, the full capabilities of this broad-based data characterization method have not yet been completely developed. BLM is committed to use ecological condition and trend as elements in the decision making process.

received in the EIS? How does ecological condition relate to such terms used elsewhere in the document as wildlife habitat condition (pages 4-19, 22, 34, 46, 57, 68, A4-3, etc.) and range condition (pages 4-15, A4-1, 2, 3, A7-1, 2, etc.)? Your analyses in both chapter 3 and 4 seem to dwell on ecological condition, but most of your management policies (Appendix 4 and Appendix 7) appear to rely on range condition. What are the relationships between these different factors and if, indeed, your management actions are to be based upon range condition, why has it not received any analysis in the EIS?

4

Another point of great confusion arises in your second alternative, Planning Recommendations, in the form of allotment categories. Don't you already have functions in place by which you prioritize management activities, investments, and projects? How did you ever manage to survive this long without some such organization? Since categorizing does appear to be a major feature of at least your preferred alternative, would you please publish a listing of the allotments in each of the three categories and the matrix of criteria by which you placedeach individual allotment? In Appendix 7 you list generalized criteria such as present range condition is generally satisfactory, present management generally satisfactory, etc. Obviously these provido no rational means of measurement. By exactly what parameters do you measure these criteria, at exactly what thresholds are all criteria considered to have shifted from a satisfactory condition to an unsatisfactory one, and exactly how were these parameters and thresholds applied to each allotment?

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Finally, most alternatives include extensive features referred to as treatments and developments. Do such massive investments of tax dollars pay for themselves? In an era of austerity in government it appears awfully extravagant for agencies such as yours to subsidize the anachronism of the western cowboy with massive infusions of tax dollars on projects that individual ranchers could never afford and would never invest in themselves.. These programs should be fated the same as the other welfare programs under the current administration. Can you show an allotment by allotment justification for all of these projects? Do they meet the test of your own stated policy (page A4-2) which requires that treatments and developments yield a benefit/cost ratio of no less than 1:1 on an allotment basis? We found no such documentation. Please publish the analyses that you have done as regards the benefit/cost ratios of your proposed projects.

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Thank you very much for this opportunity to participate.

cc: NRDC

Sincerely,

Alton E. Elbridge

Alton E. Elbridge
Orono, Maine 04478

6.4 At this time "crosswalks" between ecological condition, wildlife habitat condition, and range condition have not been fully developed. As additional data are analyzed and sorted by range site, relationships will be established.

Range condition in Appendixes 4 and 7 refers to subjective estimates of range condition and trend made by range specialists familiar with the specific allotments. Range condition and trend were not compiled for the allotments in this planning unit. Data from the survey could be compiled to yield range condition if the need were to arise.

6.5 In past decision-making processes, BLM has utilized informal and internal methods of prioritizing work. The implementation of allotment categorization reflects a formalization of this process and an opening of decision to public scrutiny.

6.6 Table 3, Appendix 8 is organized by allotment category.

6.7 Allotment categorization is not as scientific and exacting a process as is suggested by the comment. The District Manager provided the "generalized criteria" as guidance to a team of District and Area management and various range specialists. The team, based upon this guidance and individual and collective knowledge of conditions in specific allotments, placed each in one of the three categories. There was no formal documentation of this process, i.e., a detailed matrix, so more specific information is not available.

6.8 On a strict cash flow basis (dollars returned to the Treasury for tax dollars spent) Federal investments in rangeland improvements and developments do not pay for themselves. However, it is generally considered in BLM that market value (where fees are collected) and nonmarket value (such as watershed, wildlife, wild horses, etc. where fees are not collected) benefits generally exceed market and nonmarket values costs.

6.9 While the DEIS proposes various land treatments and developments under the different alternatives, the decisions regarding which alternative will be implemented and, following this decision, the specific location of the proposed treatments and developments have not yet been made. During the development of Allotment Management Plans onsite soils analyses, archeological investigations, threatened and endangered species inventories, and benefit-cost analyses will be conducted.

The Bureau of Land Management's Rangeland Management and Rangeland Improvement Policies both require economic efficiency analysis prior to the implementation of range improvement plans. Benefit-cost analyses have been conducted on past Allotment Management Plans in the Cedar City District and it is District policy to conduct these analyses on future Allotment Management Plans.

7

five county association of governments

P. O. BOX "O"
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PHONE (801) 673-3548

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AREAWIDE CLEARINGHOUSE A-95 REVIEW

Type of Action: Pre-Application ____ Notification of Intent ____ Application ____
Notice of Federal Action ____ ENVIRONMENTAL EVALUATION

Receipt Date 6-23-82 **SAI Number** ____ **ACH Number** ____

Applicant Identification, Address
Department of the Interior
Bureau of Land Management
P.O. Box 724
Cedar City, UT 84720
Morgan Jensen, District Manager 586-2401

Applicant's Project

Title: DRAFT PINYON GRAZING MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

Description: This Environmental Impact Statement analyzes the probable effects of implementing each of five alternative rangeland management programs for the Pinyon Planning Unit. The Bureau of Land Management (BLM) proposes to implement grazing management on 1,264,250 acres of public land in Utah. Based upon these analyses, inventory data, planning documents, and public input, BLM will select a rangeland management program for the Federal lands in the planning unit.

Funding N/A

Federal	$
Supplemental	
State	
Local	
Other	
TOTAL	$

Federal Funding Department and Agency

16

AREAWIDE CLEARINGHOUSE COMMENTS ON PROPOSAL FOR FEDERAL AID

Staff review completed (date) 8-3-82
Screening Committee review completed (date) 8-11-82
Executive Board Review Completed (date) ____
Referred to originator for additional information (date) ____

☐ Recommend Approval ____ Comments (see reverse side of page) ____
☐ Conditionally approved as follows (see reverse side of page) ____
☒ Recommend Disapproval ____ Comments (see reverse side of page) X

☒ The project described above ( ) does (X) does not conform with the policy or planning of the multijurisdictional area it directly impacts. Additional information ( ) is (X) is not needed.

☐ We also serve notice that all requirements of the Project Notification and Review System for this multijurisdictional area have been met. Therefore, attach this letter to your application and forward to the federal funding agency.

☐ If this project will be a renewal or continuation grant, please submit your application next year to this areawide clearinghouse for re-review 30 days prior to submission to federal funding agency.

If any Clearinghouse Comments go unresolved, Federal law requires the Applicant to attach a copy of all negative comments to the project application and forward them both to the Federal Funding Agency(ies).

☐ We would anticipate reviewing final project application 30 days prior to submission for funding.

Authorizing Official

8-12-82
Date

Copy of review sent to applicant.

AREAWIDE CLEARINGHOUSE
COMMENTS

The BLM proposes to implement grazing management on 1,264,250 acres of public land in Iron, Beaver, Washington, and Millard Counties. The objective over the long term is to increase the available livestock and wildlife forage from 60,757 and 2,663 AUMS respectively to 88,103 and 5,407 AUMS respectively.

1 The goal to increase livestock AUMS and ultimately to increase livestock production is supported; however, under the BLM's preferred alternative, operators would have to take an average of 30 percent reduction in AUMS to gain a long-term increase. A more effective approach would be to selectively adjust the grazing use and make range improvements concurrently to achieve the results rather than forcing the operators to take large cuts now and face the uncertainty of future range improvements promised by the BLM. A system that permits individual operators and the BLM to make seasonal on-site range decisions is preferable to making long-term absolute cuts. Range consultation on each grazing allotment could result in adjustments and concurrent range improvement based upon mutual data review and range monitoring. This should be an integral part of each allotment management plan (AMP). Too often, reductions in range carrying capacities have not been followed by actions to make range improvements. This has resulted in adverse socioeconomic impacts, particularly to small and medium sized operators.

2 The document does not specify how long the adjustments in grazing capacity will take nor the costs of making range improvements and the schedule for making them for each alternative. Furthermore, are funds currently available to make the improvements? If not, will cuts be sustained over a long period of time due to federal budget restrictions and uncertain range revenue, therefore leaving the operators with long-term cuts and a net reduction in production and earnings?

3 The costs of each grazing alternative and the schedule for achieving the desired results should be specified. Respective cost/benefit ratios should be analyzed in-depth.

It is inappropriate to address alternatives without knowing the associated costs to implement them. (Vaughn McDonald)

7.1 Refer to table 2-20. On the average, livestock operations would receive an overall five percent short-term stocking level increase from 60,757 AUMs to 63,820 in the Preferred Alternative. Over the long term there would be an estimated 45 percent increase from 60,757 AUMs to 88,103. Range specialists using inventory data have determined the need for cuts to protect the vegetation in some allotments; therefore, individual allotments could receive grazing reductions. However, these would be spaced over a five-year period rather than an initial large cut. After an initial reduction of no more than 10 percent, subsequent adjustments would be based upon monitoring and consultations with the affected permittee and other resource interests.

7.2 There is no set period of time over which it is anticipated that grazing level adjustments would occur. Exact duration depends upon the monitored response of the vegetation resource, the availability of funds to perform treatments and improvements, etc. Funding for projects is appropriated by Congress annually and cannot be fully projected with 100 percent confidence on a year to year basis. Therefore, there is uncertainty regarding the timing of individual actions, but in the face of such uncertainty the overall proposal is to make those adjustments necessary to protect the forage base, monitor changes, and make additional adjustments where indicated by monitoring and prioritize investments so that as funds become available the most important projects can be financed first.

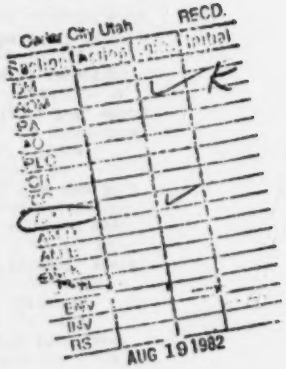
7.3 See the response to comment 6.8. Tables 2 and 5 in Appendix 8 present development and treatment types and estimated costs by allotment in each alternative.

8

STATE OF UTAH
OFFICE OF THE STATE PLANNING COORDINATOR

SCOTT M. MATHESON,
GOVERNOR

MARTHE F. DYNER,
STATE PLANNING COORDINATOR



August 18, 1982

Mr. Morgan Jensen
District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, UT 84720

Dear Mr. Jensen:

SUBJECT: Draft Pinyon Grazing Management EIS
State Application Identifier #UT820622-010

The Resource Development Coordinating Committee of the Utah State Clearinghouse has reviewed this proposal. Comments of the State of Utah are attached.

No Comment

Thank you for the opportunity to review and comment on this document. Please address any questions regarding this correspondence to Hunter Weiler, Natural Resource Analyst, State Planning Coordinator's Office, 801-533-4970.

Sincerely

Marthe F. Dyner
State Planning Coordinator

/dr

116 STATE CAPITOL BLDG. • SALT LAKE CITY, UTAH 84114 • (801) 533-5558

STATE OF UTAH COMMENTS

DRAFT PINYON GRAZING MANAGEMENT

ENVIRONMENTAL IMPACT STATEMENT

The State has reviewed the Bureau of Land Management's Draft Pinyon Grazing Management Environmental Impact Statement and offers the following comments and recommendations:

GENERAL COMMENTS

1 On both Pages S-3 and 4-15, Alternative 2--Planning Recommendations, it indicates that the objective of this alternative is to provide a balanced multiple use management program. However, there appears to be inconsistencies in the proposed action (Alternative 2) that would not result in a balanced multiple use management program. On Page 2-2, it states, "On 32 I allotments were resource conflicts have been identified, BLM proposes vegetation treatments and changes in stocking levels, management, and seasons of use in order to bring grazing use of the forage resource into line with surveyed capacity."

2 Also on Page 2-3, under I Category Allotments, it indicates that there are 21 allotments where past average licensed use exceeds the surveyed capacity and, in the short term, livestock stocking on this allotments would be reduced an overall average of 30 percent from past average licensed use. It again states on 4-19, "It was assumed for analysis purposes that the 31 I category allotments would be stocked at the surveyed capacity." These statements appear inconsistent with the information found in Table 2-4, which shows the short-term allocation as being higher than the surveyed capacity. The same information is again presented on Page 4-21, where the short-term allocation is higher than the surveyed capacity.

8.1 Alternative 2 provides a program that, over the long term, would yield a stable livestock base, provide for prior stable or long-term wildlife numbers, stabilize wild horse populations within their defined home ranges, and maintain the current satisfactory condition of associated resources such as water, soil, recreation, etc. This program would apply short-term adjustments to correct existing imbalances in order to achieve the objective long-term balanced multiple use.

8.2 Table 2-4 and page 4-21 do in fact indicate that the short-term allocation is greater than the surveyed production. However, the tables also show that the short-term allocatign is the same as the short-term production. The seeming discrepancy arises because of the AUMs that become available due to the reduction of wild horses proposed in this alternative. Of the 3,406 AUMs of forage not required to feed wild horses in this alternative (5,866 AUMs vs. 2,460 AUMs), 1,194 AUMs were identified during the survey as being competitive with livestock. Because there would be no competition for these 1,194 AUMs they would be allocated to livestock. No over-allocation of livestock forage would therefore occur.

3 Another inconsistency seems to appear between the statement on Page 4-19, which states M and C category allotments would be stocked at the average licensed use level of the last 5 to 10 years. The information presented in the table on Page 4-21 indicates a different stocking rate for the short-term allocation than the average actual use for the M category allotments.

8.3 The short-term allocation to livestock in "M" management categories has been changed to 28,581 AUMs. See the errata sheet.

4 The document also points out that there are conflicts between livestock and wildlife in certain areas, but the Environmental Statement provides no basis for judging whether those conflicts would be resolved or not by the proposed action or other alternatives. For example, on Page 3-11, last paragraph, it points out that 20 allotments in Antelope Range are overgrazed. On Page 3-14, second paragraph, it states that three allotments used by elk are overgrazed by livestock and wild horses. No information is provided elsewhere in the Environmental Statement to indicate if or how these conflicts will be resolved. Thus, even though the document indicates that there are overgrazing problems on some of the allotments and wildlife/livestock conflicts in certain areas, the proposed alternative (Alternative 2) does not present the necessary information to indicate that these problems will be resolved.

20

8.4 See Appendix 8, table 4.

5 Even though supplemental feeding is occurring in the planning unit on at least one allotment, no discussion of this practice is found in the Environmental Impact Statement. We recommend that a discussion be included on the Bureau of Land Management's policy concerning supplemental feeding.

8.5 The Bureau of Land Management recognizes the need for supplemental feeding in certain instances, and the feeding of protein supplements is allowed, subject to the approval of the resource manager. The use of harvested feed, such as hay, is not generally approved, except in emergency situations.

SPECIFIC COMMENTS

6 On Pages 1-5 and 1-6, it should read "Utah Division of Wildlife Resources" and not "Utah Department of Wildlife Resources."

7 There seems to be a contradiction between the statement on Page 2-3 under I Category allotments, which indicates a need for a reduction from present average licensed use, and Table 2-4, which indicates an increase in the short-term allocation from the average actual use.

8 Footnote a on Table 2-4, Table 2-5, and other tables needs to be explained.

9 Tables 2-4 and 2-5 surveyed production estimates for wildlife and wild horses are not estimates of forage available, only that required to support estimated present numbers. This is explained in the subscript. It would be more appropriate to show the AUM's suitable for wildlife and wild horses. Thus, the relationship between present numbers and the carrying capacity would be shown. Additionally, a table is needed showing amounts of competitive forage and how that forage is allocated to various classes of grazers.

21

10 Table 2-7, Subscript e, and the last paragraph on Page 4-15, refer to anticipated disposal of lands. Such disposal should be identified and evaluated as part of the Environmental Impact Statement.

11 Page 4-15, the stated objective of Alternative 2 is to provide for a balanced multiple use management program. This does not seem reflected in the proposed initial stocking rate where the AUM's proposed for livestock are increased above the average actual use and the AUM's for wildlife is held at the present level.

8.6 Refer to the errata sheet.

8.7 The apparent contradiction derives from the discussion on page 2-3 referring to 20 of the 32 "I" category allotments in which overgrazing problems exist and reductions are needed versus the figures in table 2-4 which refer to the totals of all "I" category allotments for which there would be an overall six percent short-term increase over current stocking. The potential increases in the 12 allotments which do not have overgrazing problems more than offset the decreases in the 20 that do.

8.8 During the inventory it was established that key forage plants could only receive grazing use up to a level that would assure adequate vigor and natural reproduction. It was also established that wildlife and wild horses would be allocated sufficient forage to feed the number of animals planned for in each alternative. This resulted in some forage being allocated to wildlife and wild horses that could have been utilized by livestock if unconstrained. This "competitive" forage was determined to be unavailable for livestock use, given the current or planned wildlife and wild horse levels.

8.9 Providing sufficient forage for existing numbers of wildlife was identified as an issue during the planning phase (see A 4-1). Information from the inventory was directed toward resolving this issue. Competitive forage between existing and proposed wildlife and wild horse numbers was determined, and estimated livestock capacities adjusted accordingly. Data was collected but not compiled regarding single use wildlife and wild horse capacities.

8.10 As indicated by subscript "e" of Table 2-7 and the discussion on page 4-15, the possible disposal of isolated tracts is a portion of the alternative and has been analyzed. For identification of individual allotments, refer to Appendix 8, table 3.

8.11 Refer to response 8.1.

12 On Page 4-15, it talks about 32 allotments in Category I. On 4-16 it refers to 31 allotments in Category I. We assume that 32 is the correct figure.

8.12 The reference to "I" category allotments has been corrected to read "32" allotments. See the errata sheet.

13 On Page 4-16 and 4-28, it discusses the fact that on some of the allotments there will be a decrease in ecological condition. It would seem that under Alternative 2, if the allotments were to be stocked at estimated grazing capacity, the ecological conditions should at least stay static.

8.13 Not all allotments would be stocked at the estimated grazing capacity in Alternative 2. As explained in table 2-7 (page 2-8) it is expected that livestock use in "C" management categories would continue at current levels. In several instances this would result in overallocation of forage (page 4-16). As also discussed on page 4-16 undesirable seasons of use by livestock and vegetation treatments would also cause changes in ecological conditions.

9

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P. O. BOX 2711
LOS ANGELES, CALIFORNIA 90053

IN REPLY REFER TO
SPLPD-E

16 AUG 1982

Mr. Morgan Jensen, District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, Utah 84720

Dear Mr. Jensen:

This is in response to a letter from your office which requested review and comments on the Draft Pinyon Grazing Management Environmental Impact Statement.

The proposed plan does not conflict with existing or authorized plans of the Corps of Engineers within the geographical limits of the Los Angeles Engineer District. We have no comments on the proposal. We suggest that you contact the Sacramento Engineer District for comments regarding that area (Iron, Millard and Beaver Counties in Utah) which falls within its geographical limits.

No Comment

23

Thank you for the opportunity to review and comment on the proposed plan.

Sincerely,

CARL T. ENSS
Acting Chief, Planning Division

Cedar City Utah RECD

Section	Action	Initial
DZ		C
ADM		K
PA		
AO		
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August 16, 1982

Morgan Jensen
Cedar City District Manager
Bureau of Land Management
P.O. Box 724
Cedar City, Utah 84720

Re: Pinyon Grazing Management
Environmental Impact Statement

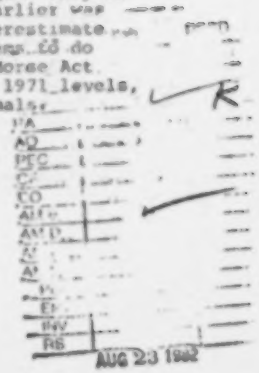
Dear Mr. Jensen:

24

I am writing on behalf of the American Horse Protection Association, Inc., to offer its comments concerning the draft Pinyon Grazing Management EIS.

1 The draft Pinyon EIS is, in AHPA's view, an inaccurate and misleading analysis of BLM's proposed action. Perhaps the most obvious error is its reliance on the 1971 population estimate for wild horses as the appropriate management level today. To begin with, a variety of studies conducted since 1971 have shown that even current censusing techniques vary in accuracy; the accuracy of counts made in 1971 or earlier was certainly poor, and probably was a significant underestimate of actual populations. If BLM assumes -- as it seems to do here and in many other districts -- that the Wild Horse Act requires only that BLM manage wild horses at their 1971 levels,

2 the Pinyon EIS should provide for at least 300 animals.



10.1 See response to letter 2, comment 2.

10.2 See response to letter 2, comment 2.

3 More to the point, the Act requires that wild horses be managed as an integral part of the multiple use system of the public lands. The draft ignores this command by establishing a program to increase livestock forage significantly and double the available wildlife forage over the long term, all at the expense of drastic and permanent reductions in wild horse numbers. The wild horse population will be reduced by 61%, from 552 to 215, the misleading 1971 "population" level. It will be kept there despite an anticipated increase of forage production of nearly 50% over the next 15-20 years.

10.3 The Bureau of Land Management is mandated by the Federal Land Policy and Management Act of 1976 to manage public lands in accordance with the "multiple use" concept. In following this mandate it is necessary to analyze the major impacts occurring to all natural resources. By maintaining wild horse populations at 215 head their wild and free-roaming nature would not be obstructed, but would still allow BLM to meet its obligations to other resources and resource users.

4 One of the principal reasons given for the wild horse reductions is the claimed competition between wild horses and wildlife -- mule deer, antelope and elk -- for forage, expecially in summer ranges. The draft claims, for example, that wild horses, like mule deer, "tend to prefer succulent forage, primarily forbs, during the summer months." (3-11). Other statements are made concerning overutilization of browse species.

Forbs and browse in the wildlife summer ranges may be overutilized, but almost certainly not by wild horses. Wild horse diets are never "primarily" forb or browse, regardless of the season. I am enclosing a table from the National Academy of Sciences' Phase I report on wild horses and burros, which shows a wild horse diet of nearly 90% grasses, and about 5% each forbs and browse. Consumption of forbs is significant only in the desert grassland vegetation type -- which does not seem to fit the Pinyon Planning Unit -- and even there forb consumption is lowest in the summer. Therefore, while competition may exist in fact for forbs and browse on the summer range, it is most likely attributable to livestock, especially sheep (see p. 3-14).

10.4 As stated on page 3-11, the DEIS identifies a general lack of plant diversity, especially forbs. Forbs constitute a major source of succulent forage used by livestock, wild horses, mule deer, and elk, especially during the spring and early summer. Much of the mule deer and elk summer range is used only by these species and wild horses resulting in the competition for forbs. A report prepared by the Committee on Developing Strategies for Rangeland Management (1981) discusses the limitations which must be understood when using fecal analysis. The report states "the species in the feces may not be proportional to those consumed because of differential digestibility and recognizability. In several studies the composition of grasses and shrubs in the feces was significantly higher than in the diet, whereas the converse was the case for forbs." Also see comment 2.10.

5 The draft also discusses, in a general way, competition between wild horses and livestock. It is difficult for AHPA to judge the extent of current competition, but Table 3-2 seems to indicate that competitive wild horse forage is only about 35% of total wild horse forage demand and only about 4% of total surveyed livestock forage production.*/ Despite this very small level of actual competition, the proposed action would reduce competitive wild horse forage to only about 1.15% of livestock production in the short term and less than 1% in the long term.

10.5 See response to letter 2, comment 10.

6 At the same time, actual livestock forage allocations will rise considerably. Although the draft refers to reductions in livestock numbers, that is misleading. In the short term, forage allocations to livestock will increase from 60,757 AUMs current actual use to 63,820 AUMs. This number could rise considerably, since in the "M" and "C" management catagories the permittees could activate their grazing use up to their active preference levels -- another 10,584 AUMs. Over the long term, forage allocations will increase to at least 88,103 AUMs, and total available livestock forage will increase to over 113,000 AUMs.

10.6 See response to letter 7, comment 1.

Clearly, livestock interests are not suffering under the proposed plan. Regrettably, the Pinyon draft continues BLM's unlawful practice of using large, permanent reductions in wild horse numbers to make larger allocations of forage to livestock possible.

AHPA could understand and accept wild horse population cuts if they were part of an overall reduction of grazing pressures

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7 */ Another problem with the draft is that it assumes that a wild horse will consume 1.25 AUMs or more of forage per month. This figure is debatable at best; BLM's regulations have long defined horse forage consumption at 1 AUM per month. Ongoing research may at some point provide answers to the questions surrounding wild horse forage consumption, but the draft's use of a 1.25 AUM rate is inappropriate.

10.7 In order to establish the most credible forage requirements possible for use in Utah, individuals from academic basckgrounds, State government agencies, livestock organizations, the Soil Conservation Service, and BLM participated in a work group to provide a joint recommendation for forage requirements. The 1.25 AUM rate for horses was derived from this meeting and was used in calculating forage requirements (BLM Instruction Memorandum No. UT 80-349, May 14, 1980.

in order to permit forage resources to recover, and if wild horse numbers were allowed to increase as forage improved. Unfortunately, here the burden of reducing grazing pressures fails disproportionately on wild horses, and none of the alternatives considers allowing their numbers to increase in the future. The array of alternatives poses extreme solutions rather than a balanced allocation of resources, and consequently distorts the analysis of costs and benefits required by the National Environmental Policy Act. AHPA urges that these deficiencies be corrected in a new draft of the EIS.

Finally, AHPA endorses the excellent comments submitted by the Humane Society of Utah, especially those directed toward the intensive management practices necessary for some of the very small herd areas. Such practices directly contradict the Wild Horse Act's command that management be at the "minimal feasible level," and cannot be permitted.

27

Very truly yours,

Russell J. Gaspar

Attorney for American Horse
Protection Association, Inc.

cc: Joan R. Blue
John Paul Fox
RJG:bb

TABLE 3.22 Diets of Wild, Free-Roaming Horses Over a Range of Vegetation Types and Seasons, as Determined by Fecal Analysis

Study	Vegetation Type(s)	Season(s)	Dietary Composition (%) Grasses	Forbs	Browse
Hansen (1976)	Desert grassland	Spring	50	20	9
		Summer	50	13	28
		Fall	36	31	26
		Winter	36	42	21
		Annual	47	28.5	21.5
Hubbard and Hansen (1976)	Mountain shrub	Annual	85	1	12
	Pinyon-juniper	Annual	89	0	7
	Ecotone	Annual	97	0	2
Hansen and others (1977)	Sagebrush-grass and pinyon-juniper	Annual	94	0	5
Olsen and Hansen (1977)	Sagebrush-grass and saltbrush	Annual	91	0	5
Kelter and Hudson (1979)	Upper foothills of boreal forest	Jan-Mar	87.5	0.4	5.9
		Apr-May	92.5	0.6	3.0
		June-Aug	98.5	0.6	2.3
		Sept-Oct	95.2	1.9	1.5
		Nov-Dec	89.3	0.4	5.1
		Annual	92.6	0.8	3.6
Vavra and Kneva (1978)	Desert-forest fringe of the cold desert	Normal Year			
		Spring	99	—	—
		Fall	98	—	—
		Winter	100	—	—
		Annual	99	—	—
		Dry Year			
		Spring	95	—	—
		Summer	100	—	—
		Fall	100	—	—
		Winter	97	—	—
		Annual	98	—	—
Vavra and Kneva (1978)	Sagebrush-grass (4 locations varying in sagebrush dominance)	Annual	92.0	7.0	0.2
		Annual	93.9	3.6	0.5
		Annual	85.0	12.9	2.2
		Annual	95.2	2.5	2.4
Mean and coefficient of variation (%) over all seven studies			89.4 (15.1)	5.8 (146.7)	5.1 (125.7)

August 15, 1982

11

Bureau of Land Management

Post Office Box 724

Cedar City, Utah 84720

Comments on Pinyon Grazing Managment Environmental Impact Statement:

I would like to state that this Draft Statement is a complete waste of taxpayers money, both in material and man-power, for as any good land manager knows, to get sustained maximum yeild from the land, wild-life and livestock complement each other.

Managing for sustained maximum yeild will also improve and maintain the range with a lot of desirable plants in a healthy condition.

I believe that this can be done without a decrease in sheep, cattle, or wild-life production, through more intensive managment.

28 I support Dr. Allen Savory's theroy. "The more intense the managment, the more it will yeild, and the more health and vigor the range will have".

In order to do this, I recommend the following course of action:

1 1. The wild horse and free roaming burro act be abolished, for horses are domestic livestock and they are covered by state law.

2. The Department of the Interior decrease its labor force by 2/3.

2 3. The government should recognize permits and they should have a market value.

3 4. More responsiblity should be placed on permitees for proper managment.

11.1 These suggestions are beyond the authority of BLM and outside the scope of this EIS.

11.2 The Taylor Grazing Act of 1934 which established the authority under which BLM is empowered to set up allotments and issue grazing permits expressly forbids the recognition of market value for grazing privileges permits.

11.3 The intensified management proposed under the preferred alternative would place increased responsibilities on permittees in requiring increased use supervision, increased maintenance of treatments and facilities, etc.

5. A revolving, no interest loan fund should be set up for permitees, for range-land improvement.

4 a. Said fund to be administered by the various State Department's of Agriculture, with technical help from the Soil Conservation Service.

11.4 · See response 11.1.

If all Environmental Impact Statements were scraped, and this course of action taken which I have out-lined, you would see a dramatic improvement in the rangelands of the U. S. There would be more wild-life of all kinds. There would still be horses on the range. It would provide plenty of forage for a healthy livestock industry. The quality of water would improve greatly, and the soil would become much more stable.

Sincerely,

Jay Hunt
Box 32
Enterprise, Ut. 84725

cc Senator Jake Garn
Senator Orrin Hatch

Table 1

Estimated Average Costs of Range Treatments and Developments*
(1982 dollars)

Treatments	Costs per Acre
Chain-burn-broadcast-chain	$32.50
Chain-broadcast-chain	27.50
Chain-burn-broadcast	27.00
Chain-broadcast	22.00
Chain-burn-drill	28.00
Prescribed burn	6.50
Burn-drill	19.00
Burn-broadcast	19.50
Burn-broadcast-chain	28.50
Burn-chain-broadcast	28.50
Plow-drill	29.00
Spray	12.00
Spray-broadcast-chain	34.00

Developments	Costs/Unit
Cattleguard	$ 2,100/each
Fence	2,400/mile
Pipeline	4,200/mile
Reservoir/Catchment	2,500/each
Spring	1,700/each
Tank	1,860/each
Trough	1,300/each
Well	7,750/each
Windmill and Well	11,750/each

*All cost estimates are based on recent treatments and developments in the Cedar City District. Costs for developments represent the cost for the average size, depth, etc. of each facility.

Table 2

Approximate Costs of Treatments and Facilities Under Proposed Alternatives
(1982 dollars)

	Alternative 1 Continuation of Present Management		Alternative 2 Planning Recommendations		Alternative 3 Livestock Grazing Preference		Alternative 4.1 Resident Resource Values (Wildlife)		Alternative 4.2 Resident Resource Values (Wild Horses		Alternative 5 Livestock Maximization	
VEGETATION TREATMENTS	(Acres) (AUMs)	(Total Cost)	(Acres) (AUMs)	(Total Cost)	(Acres) (AUMs)	(Total Cost)	(Acres) (AUMs)	(Total Cost)	(Acres) (AUMs)	(Total Cost)	(Acres) (AUMs)	(Total Cost)
	0 0		99,616 16,903	$2,799,733	104,545 20,909	$2,706,855	107,260 17,331	$2,972,936	0 0	$0	841,282 173,386	$21,958,625
FACILITIES	(Number)	(Total Cost)	(Number)	(Total Cost)	(Number)	(Total Cost)	(Number)	(Total Cost)	(Number)	(Total Cost)	(Number)	(Total Cost)
Spring Developments	0	$0	20	$ 34,000	29	$ 49,300	36	$ 61,200	37	$ 62,900	51	$ 86,700
Wells	0	0	3	23,250	10	77,500	5	38,750	3	23,250	20	155,000
Reservoirs/ Catchments	0	0	5	12,500	7	17,500	47	117,500	2	5,000	18	45,000
Tanks	0	0	---	--------	3	5,580	1	1,860	--	-------	5	9,300
Troughs	0	0	65	84,500	122	158,600	66	85,800	40	52,000	204	265,200
Miles of Pipeline	0	0	131	550,200	211	886,200	118	495,600	--	-------	325	1,365,000
Windmills	0	0	---	--------	6	70,500	5	58,750	--	-------	35	411,250
	-	-	---	--------	---	--------	---	--------	--	-------	---	---------
Miles of Fence	0	0	152	364,800	262	628,800	222	532,800	--	-------	922	2,212,800
Cattleguards	0	0	4	8,400	14	29,400	1	2,100	--	-------	4	8,400
Total Cost of All Treatments and Facilities		$0		$3,877,383		$4,630,235		$4,367,296		$143,150		$26,362,275

Table 3
Estimated Forage Available by Allotment

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
I CATEGORY													
ANTELOPE PEAK													
Single Use C.C.	4,167												
Livestock	4,063	4,063	4,063	4,164	6,908	4,164	6,908	4,164	6,908	3,962	3,911	4,164	9,960
Deer	18	18	18	18	39	18	18	18	39	18	18	18	18
Antelope	37	37	37	37	65	37	37	37	65	37	37	37	37
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	188	188	188	0	0	0	0	0	0	360	450	0	0
Total Allocation	4,306	4,306	4,633	4,219	7,012	4,219	6,963	4,219	7,012	4,377	4,416	4,219	10,015
BAGNALL													
Single Use C.C.	622												
Livestock	932	932	932	621	775	621	776	621	775	621	776	621	2,376
Deer	3	3	3	3	5	3	3	3	2	3	3	3	3
Antelope	10	10	10	10	19	10	10	10	19	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	945	945	945	634	799	634	789	634	799	634	789	634	2,389
BEAVER LAKE													
Single Use C.C.	868												
Livestock	1,365	1,365	1,365	856	2,458	863	2,484	850	2,465	797	1,395	863	2,480
Deer	12	12	12	12	30	12	12	12	30	12	12	12	12
Antelope	14	14	14	14	30	14	14	14	30	14	14	14	14
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	15	15	0	0	30	30	150	150	0	0
Total Allocation	1,541	1,541	1,541	897	2,533	889	2,510	906	2,555	973	1,571	889	2,806
BENNION SPRING													
Single Use C.C.	1,620												
Livestock	1,689	1,689	1,689	1,589	2,608	1,589	2,674	1,589	2,022	1,496	2,082	1,589	4,443
Deer	115	115	115	115	253	115	115	115	253	115	115	115	115
Antelope	22	22	22	22	38	22	22	22	38	22	22	22	22
Elk	76	76	76	76	246	76	76	76	246	76	76	76	76
Wild Horses	300	300	300	0	0	0	0	0	0	300	300	0	0
Total Allocation	2,202	2,202	2,202	1,802	3,145	1,802	2,887	1,802	2,559	1,739	2,595	1,802	4,656

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
BUCKHORN													
Single Use C.C.	1,830												
Livestock	3,370	3,370	3,370	1,824	3,357	1,824	3,362	1,824	3,357	1,824	2,462	1,824	5,209
Deer	7	7	7	7	14	7	7	7	14	7	7	7	7
Antelope	36	36	36	36	64	36	36	36	64	36	36	36	36
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	3,413	3,413	3,413	1,867	3,435	1,867	3,405	1,867	3,435	1,867	2,505	1,867	5,252
BULL SPRING													
Single Use C.C.	1,172												
Livestock	1,099	1,099	1,099	1,168	1,749	1,150	1,734	1,131	1,712	1,095	1,095	1,168	4,098
Deer	21	21	21	21	47	21	21	21	47	21	21	21	21
Antelope	15	15	15	15	27	15	15	15	27	15	15	15	15
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	240	240	240	0	0	60	60	120	120	240	240	0	0
Total Allocation	1,375	1,375	1,372	1,204	1,823	1,246	1,835	1,284	1,406	1,371	1,368	1,201	4,131
CHOKECHERRY													
Single Use C.C.	492												
Livestock	202	202	202	492	912	492	912	492	912	492	492	492	1,523
Deer	6	6	6	6	14	6	6	6	14	6	6	6	6
Antelope	6	6	6	6	10	6	6	6	10	6	6	6	6
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	150	150	120	120	180	180	150	150	0	0
Total Allocation	364	364	364	654	1,086	624	1,044	684	1,116	654	654	504	1,535
EIGHT MILE SPRING													
Single Use C.C.	80												
Livestock	140	140	140	75	422	75	430	54	401	213	63	75	760
Deer	3	3	3	3	7	3	3	3	7	3	3	3	3
Antelope	4	4	4	4	6	4	4	4	6	4	4	4	4
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	0	0	0	0	30	30	75	75	0	0
Total Allocation	222	222	222	82	435	82	437	91	444	105	145	82	767

	Existing	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
	Situation	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
FRISCO													
Single Use C.C.	2,025												
Livestock	1,656	1,656	1,656	2,006	4,244	2,015	4,265	2,009	4,247	1,986	1,986	2,015	5,795
Deer	43	43	43	43	94	43	43	43	94	43	43	43	43
Antelope	10	10	10	10	19	10	10	10	19	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	45	45	0	0	30	30	150	150	0	0
Total Allocation	1,859	1,859	1,859	2,104	4,402	2,068	4,318	2,092	4,390	2,189	2,189	2,068	5,848
GOLD SPRING													
Single Use C.C.	36												
Livestock	232	232	232	36	360	36	360	36	360	36	45	36	416
Deer	29	29	29	29	64	29	29	29	64	29	29	29	29
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	0	0	0	0	60	60	150	150	0	0
Total Allocation	411	411	411	65	424	65	389	125	488	215	224	65	445
HARDPAN													
Single Use C.C.	2,506												
Livestock	1,812	1,812	1,812	2,499	2,703	2,495	2,703	2,499	2,703	2,485	2,485	2,502	5,200
Deer	34	34	34	34	74	34	34	34	74	34	34	34	34
Antelope	13	13	13	13	22	13	13	13	22	13	13	13	13
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	15	15	30	30	15	15	75	75	0	0
Total Allocation	1,934	1,934	1,934	2,561	2,814	2,572	2,780	2,561	2,814	2,607	2,607	2,549	5,247
HAYSTACK MOUNTAIN													
Single Use C.C.	312												
Livestock	496	496	496	243	765	311	833	266	788	198	220	311	1,744
Deer	24	24	24	24	24	24	24	24	24	24	24	24	24
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	90	90	0	0	60	60	150	150	0	0
Total Allocation	670	670	670	357	879	335	1,007	350	872	372	394	335	1,768

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
HEBRON													
Single Use C.C.	360												
Livestock	638	638	638	312	832	353	873	324	844	283	323	353	574
Deer	34	34	34	34	34	34	34	34	34	34	34	34	34
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	180	180	180	105	105	0	0	75	75	180	180	0	0
Total Allocation	852	852	852	451	971	387	907	433	953	497	537	387	608
INDIAN CREEK													
Single Use C.C.	181												
Livestock	416	416	416	181	1,145	181	1,145	181	181	181	317	181	4,065
Deer	18	18	18	18	41	18	18	18	41	18	18	18	18
Antelope	15	15	15	15	19	15	15	15	19	15	15	15	15
Elk	15	15	15	15	44	15	15	15	44	15	15	15	15
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	464	464	464	229	1,249	229	1,193	229	466	229	365	229	4,113
INDIAN PEAK													
Single Use C.C.	2,082												
Livestock	1,341	1,341	1,341	1,838	2,423	1,974	2,563	2,079	2,555	1,435	1,364	2,079	14,186
Deer	73	73	73	73	162	73	73	73	162	73	73	73	73
Antelope	22	22	22	22	38	22	22	22	38	22	22	22	22
Elk	28	28	28	28	94	28	28	28	94	28	28	28	28
Wild Horses	1,200	1,200	1,200	930	930	405	405	0	0	2,415	2,760	0	0
Total Allocation	2,664	2,664	2,664	2,891	3,647	2,202	3,091	2,202	2,849	3,991	4,247	2,202	14,309
JOCKEYS													
Single Use C.C.	1,053												
Livestock	956	956	956	1,019	3,019	1,048	3,054	1,029	3,029	932	903	1,048	5,734
Deer	36	36	36	36	81	36	36	36	81	36	36	36	36
Antelope	6	6	6	6	10	6	6	6	10	6	6	6	6
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	105	105	105	45	45	0	0	30	30	180	225	0	0
Total Allocation	1,103	1,103	1,103	1,106	3,155	1,090	3,096	1,101	3,150	1,154	1,170	1,090	5,776

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
JOHNS													
Single Use C.C.	21												
Livestock	175	175	175	19	231	19	233	19	231	19	30	19	923
Deer	16	16	16	16	34	16	16	16	34	16	16	16	16
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	12	12	12	12	38	12	12	12	38	12	12	12	12
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	203	203	203	47	303	47	261	47	303	47	58	47	951
KILN SPRING													
Single Use C.C.	1,227												
Livestock	1,232	1,232	1,232	1,165	2,133	1,208	2,197	1,183	2,151	1,066	1,066	1,208	3,418
Deer	45	45	45	45	100	45	45	45	100	45	45	45	45
Antelope	18	18	18	18	32	18	18	18	32	18	18	18	18
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	345	345	345	105	105	0	0	60	60	345	345	0	0
Total Allocation	1,640	1,640	1,640	1,333	2,370	1,271	2,260	1,306	2,343	1,474	1,474	1,271	3,481
MATHESON													
Single Use C.C.	152												
Livestock	234	234	234	151	273	151	274	151	233	151	226	151	394
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	4	4	4	4	8	4	4	4	8	4	4	4	4
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	238	238	238	155	281	155	278	155	241	155	230	155	398
MILFORD CATTLE													
Single Use C.C.	348												
Livestock	313	313	313	348	564	348	564	348	564	348	435	348	908
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	8	8	8	8	13	8	8	8	13	8	8	8	8
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	321	321	321	356	577	356	572	356	577	356	443	356	916

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
MODENA CANYON													
Single Use C.C.	131												
Livestock	121	121	121	126	869	116	865	96	839	66	66	126	579
Deer	32	32	32	32	71	32	32	32	71	32	32	32	32
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	90	90	90	0	0	15	15	45	45	90	90	0	0
Total Allocation	243	243	243	158	940	163	912	173	955	188	188	158	611
MOUNTAIN HOME													
Single Use C.C.	0												
Livestock	0	0	0	0	0	0	0	0	0	0	0	677	3,897
Deer	122	122	122	122	267	122	122	122	267	122	122	122	122
Antelope	5	5	5	5	10	5	5	5	10	5	5	5	5
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	750	750	750	585	585	555	555	225	225	1,560	1,770	0	0
Total Allocation	877	877	877	712	863	682	682	352	502	1,687	1,897	804	4,024
MOUNTAIN SPRING													
Single Use C.C.	1,014												
Livestock	458	458	458	1,008	1,374	1,008	1,381	1,008	1,008	817	817	1,008	4,374
Deer	26	26	26	26	58	26	26	26	58	26	26	26	26
Antelope	2	2	2	2	8	2	2	2	8	2	2	2	2
Elk	19	19	19	15	44	19	19	19	44	19	19	15	15
Wild Horses	375	375	375	0	0	0	0	0	0	375	375	0	0
Total Allocation	856	856	856	1,051	1,484	1,051	1,424	1,051	1,111	1,239	1,239	1,051	4,417
MT. ELINOR													
Single Use C.C.	143												
Livestock	352	352	253	143	510	143	510	125	492	99	135	143	997
Deer	9	5	5	5	12	5	5	5	12	5	5	5	5
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	0	0	0	0	30	30	75	75	0	0
Total Allocation	432	432	432	148	522	148	515	160	534	179	215	148	1,002

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
ROSE VALLEY													
Single Use C.C.	98												
Livestock	146	146	146	97	289	97	290	88	273	97	82	97	1,076
Deer	10	10	10	10	22	10	10	10	22	10	10	10	10
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	0	0	0	0	60	60	150	150	0	0
Total Allocation	306	306	306	107	311	107	300	158	355	257	242	107	1,086
SEVY WEST													
Single Use C.C.	2,763												
Livestock	1,874	1,874	1,874	2,695	3,932	2,741	4,317	2,788	3,938	2,817	2,654	2,778	6,785
Deer	74	74	74	74	74	74	74	74	74	74	74	74	74
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	225	225	225	120	120	0	0	105	105	225	225	0	0
Total Allocation	2,173	2,173	2,173	2,889	4,126	2,815	4,391	2,880	4,117	2,916	2,953	2,845	6,859
SEWING MACHINE													
Single Use C.C.	750												
Livestock	331	331	331	749	1,045	749	1,058	0	736	749	749	749	1,641
Deer	12	12	12	12	26	12	12	12	26	12	12	12	12
Antelope	4	4	4	4	8	4	4	4	8	4	4	4	4
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	347	347	347	765	1,079	765	1,074	16	770	765	765	765	1,657
SHEEP SPRING													
Single Use C.C.	165												
Livestock	0	0	0	151	666	151	686	151	631	86	86	151	2,642
Deer	18	18	18	18	41	18	18	18	41	18	18	18	18
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	23	2	23	23	82	23	23	25	82	23	2	23	23
Wild Horses	75	75	75	0	0	0	0	0	0	75	75	0	0
Total Allocation	116	116	116	192	789	192	727	194	754	202	202	192	2,683

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
SMITH JONES													
Single Use C.C.	139												
Livestock	147	147	147	116	248	135	267	122	254	103	103	135	612
Deer	17	17	17	17	17	17	17	17	17	17	17	17	17
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	45	45	0	0	30	30	75	75	0	0
Total Allocation	239	239	239	178	310	152	152	169	301	195	195	152	629
TILLY CREEK													
Single Use C.C.	365												
Livestock	705	705	705	364	808	364	809	0	362	365	448	364	1,417
Deer	6	6	6	6	14	6	6	6	14	6	6	6	6
Antelope	14	14	14	14	26	14	14	14	26	14	14	14	14
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	0	0	0	0	30	30	75	75	0	0
Total Allocation	800	800	800	384	848	384	829	50	432	458	543	384	1,437
WATER HOLLOW													
Single Use C.C.	1,481												
Livestock	1,602	1,602	1,602	1,443	2,696	1,477	2,734	1,452	2,705	1,343	1,672	1,477	5,084
Deer	21	21	21	21	45	21	21	21	45	21	21	21	21
Antelope	22	22	22	22	40	22	22	22	40	22	22	22	22
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	120	120	120	60	60	0	0	45	45	240	300	0	0
Total Allocation	1,765	1,765	1,765	1,946	2,841	1,520	2,777	1,540	2,835	1,626	2,015	1,520	5,077
WILLOW CREEK													
Single Use C.C.	5,618												
Livestock	1,580	1,580	1,580	5,502	6,772	5,564	6,847	5,543	6,813	5,061	4,948	5,605	9,186
Deer	22	22	22	22	47	22	22	22	47	22	22	22	22
Antelope	23	23	23	23	42	23	23	23	42	23	23	23	23
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	398	398	398	150	150	60	60	0	0	795	960	0	0
Total Allocation	2,023	2,023	2,023	5,697	7,011	5,669	6,952	5,588	6,902	5,881	5,953	5,650	9,231

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
M CATEGORY													
ATCHISON CREEK													
Single Use C.C.	954												
Livestock	266	266	266	266	266	919	940	946	936	873	871	946	4,780
Deer	70	70	70	70	153	70	70	70	153	70	70	70	70
Antelope	18	18	18	18	32	18	18	18	32	18	18	18	18
Elk	35	35	35	35	136	35	35	35	136	35	35	35	35
Wild Horses	75	75	75	60	60	60	60	0	0	150	165	0	0
Total Allocation	464	464	464	449	647	1,102	1,123	1,069	1,257	1,146	1,159	1,069	4,903
BLUE MOUNTAIN													
Single Use C.C.	866												
Livestock	692	692	692	692	692	865	1,160	865	1,159	865	1,160	865	1,643
Deer	11	11	11	11	25	11	11	11	25	11	11	11	11
Antelope	29	29	29	29	52	29	29	29	52	29	29	29	29
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	732	732	732	732	769	905	1,200	905	1,236	905	1,200	905	1,683
BUCKET RANCH													
Single Use C.C.	1,535												
Livestock	721	721	721	721	721	1,499	1,514	1,476	1,471	1,178	1,109	1,530	4,654
Deer	49	49	49	49	101	49	49	49	101	49	49	49	49
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	349	349	349	195	195	69	69	195	195	690	855	0	0
Total Allocation	1,119	1,119	1,119	965	1,017	1,608	1,623	1,630	1,623	1,917	2,013	1,579	4,703
BUCKET RANCH LAMBING													
Single Use C.C.	316												
Livestock	152	152	152	152	152	316	356	316	356	316	356	316	381
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	152	152	152	152	152	316	356	316	356	316	356	316	381

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
BURN KNOLL													
Single Use C.C.	1,151												
Livestock	955	955	955	955	955	1,149	1,887	1,151	1,149	1,065	1,048	1,149	3,672
Deer	9	9	9	9	20	9	9	9	20	9	9	9	9
Antelope	29	29	29	29	52	29	29	29	52	29	29	29	29
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	90	90	90	0	0	0	0	0	0	150	180	0	0
Total Allocation	1,083	1,083	1,083	993	1,027	1,187	1,925	1,194	1,221	1,253	1,266	1,187	3,710
BUTCHER													
Single Use C.C.	1,192												
Livestock	801	801	801	801	801	1,191	1,956	1,191	1,190	1,190	1,191	1,191	1,767
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	10	10	10	10	19	10	10	10	19	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	811	811	811	811	820	1,201	1,966	1,201	1,209	1,200	1,201	1,201	1,777
COOK													
Single Use C.C.	3,026												
Livestock	2,825	2,825	2,825	2,825	2,825	3,017	3,821	3,017	3,009	3,017	3,017	3,017	4,785
Deer	6	6	6	6	14	6	6	6	14	6	6	6	6
Antelope	63	63	63	63	111	63	63	63	111	63	63	63	63
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	2,894	2,894	2,894	2,894	2,950	3,086	3,890	3,086	3,034	3,086	3,086	3,086	4,854
HIGHROCK													
Single Use C.C.	1,463												
Livestock	1,344	1,344	1,344	1,344	1,344	1,451	2,718	1,457	1,456	1,435	1,435	1,462	3,456
Deer	6	6	6	6	14	6	6	6	14	6	6	6	6
Antelope	5	5	5	5	10	5	5	5	10	5	5	5	5
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	75	75	75	30	30	30	30	15	15	75	75	0	0
Total Allocation	1,430	1,430	1,430	1,385	1,398	1,442	2,759	1,483	1,495	1,521	1,521	1,473	3,467

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
JACKSON													
Single Use C.C.	1,885												
Livestock	1,803	1,803	1,803	1,803	1,803	1,883	3,295	1,883	1,881	1,883	1,883	1,883	3,410
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	19	19	19	19	34	19	19	19	34	19	19	19	19
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	1,822	1,822	1,822	1,822	1,837	1,902	3,314	1,902	1,915	1,902	1,902	1,902	3,429
JACKSON WASH													
Single Use C.C.	1,420												
Livestock	811	811	811	811	811	1,362	1,680	1,344	1,286	1,315	1,345	1,374	3,455
Deer	38	38	38	38	84	38	38	38	84	38	38	38	38
Antelope	22	22	22	22	38	22	22	22	38	22	22	22	22
Elk	56	56	56	56	186	56	56	56	186	56	56	56	56
Wild Horses	150	150	150	0	0	30	30	75	75	150	150	0	0
Total Allocation	1,077	1,077	1,077	927	1,119	1,508	1,826	1,535	1,669	1,581	1,611	1,490	3,571
LONE PINE SPRING													
Single Use C.C.	1,220												
Livestock	575	575	575	575	575	1,199	2,369	1,212	1,202	1,175	1,175	1,212	5,125
Deer	42	42	42	42	42	42	42	42	42	42	42	42	42
Antelope	5	5	5	5	9	5	5	5	9	5	5	5	5
Elk	23	23	23	23	70	23	23	23	70	23	23	23	23
Wild Horses	255	255	255	0	0	90	90	0	0	255	255	0	0
Total Allocation	900	900	900	645	696	1,359	2,529	1,282	1,373	1,500	1,500	1,283	5,196
LUND													
Single Use C.C.	2,069												
Livestock	2,038	2,038	2,038	2,038	2,038	2,030	3,289	1,989	1,978	1,922	1,922	2,057	5,705
Deer	9	9	9	9	21	9	9	9	21	9	9	9	9
Antelope	2	42	42	42	75	42	42	42	75	42	42	42	42
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	300	300	300	0	0	60	60	150	150	300	300	0	0
Total Allocation	2,389	2,389	2,389	2,089	2,134	2,141	3,400	2,190	2,224	2,273	2,273	2,108	5,756

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
NO GRAZING													
Single Use C.C.	314												
Livestock	--	0	0	0	0	311	311	311	308	311	311	311	1,400
Deer	17	17	17	17	37	17	17	17	37	17	17	17	17
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	17	17	17	17	37	328	328	328	345	328	328	328	1,417
PINE VALLEY													
Single Use C.C.	620												
Livestock	572	572	572	572	572	610	736	619	618	619	619	619	940
Deer	6	6	6	6	13	6	6	6	13	6	6	6	6
Antelope	14	14	14	14	26	14	14	14	26	14	14	14	14
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	592	592	592	592	611	639	756	639	657	639	639	639	960
RED COVE													
Single Use C.C.	3,234												
Livestock	1,144	1,144	1,144	1,144	1,144	3,224	4,441	3,224	3,217	3,224	3,224	3,224	5,080
Deer	24	24	24	24	54	24	24	24	54	24	24	24	24
Antelope	27	27	27	27	48	27	27	27	48	27	27	27	27
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	1,195	1,195	1,195	1,195	1,246	3,275	4,492	3,275	3,319	3,275	3,275	3,275	5,131
ROSEBUD													
Single Use C.C.	104												
Livestock	72	72	72	72	72	96	96	87	86	69	69	103	476
Deer	9	9	9	4	20	9	9	9	20	9	9	9	9
Antelope	3	3	3	3	5	3	3	3	5	3	3	3	3
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	225	225	225	0	0	45	45	105	105	225	225	0	0
Total Allocation	309	309	309	79	97	153	153	204	216	306	306	115	488

	Existing	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
	Situation	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
SHAUNTIE													
Single Use C.C.	1,701												
Livestock	1,260	1,260	1,260	1,260	1,260	1,700	2,091	1,699	2,090	1,634	1,621	1,700	3,315
Deer	16	16	16	16	34	16	16	16	34	16	16	16	16
Antelope	14	14	14	14	26	14	14	14	26	14	14	14	14
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	90	90	90	0	0	0	0	0	0	150	180	0	0
Total Allocation	1,380	1,380	1,380	1,290	1,320	1,730	2,121	1,729	2,150	1,814	1,831	1,730	3,345
SHEEP CREEK													
Single Use C.C.	3,222												
Livestock	2,541	2,541	2,541	2,541	2,541	3,198	3,762	3,198	3,110	3,198	3,198	3,198	3,870
Deer	68	68	68	68	149	68	68	68	149	68	68	68	68
Antelope	8	8	8	8	14	8	8	8	14	8	8	8	8
Elk	34	34	34	34	113	34	34	34	113	34	34	34	34
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	2,651	2,651	2,651	2,651	2,817	3,308	3,872	3,308	3,386	3,308	3,308	3,308	3,980
SPANISH GEORGE													
Single Use C.C.	850												
Livestock	711	711	711	711	711	849	1,274	849	1,272	849	1,273	849	1,760
Deer	9	9	9	9	19	9	9	9	19	9	9	9	9
Antelope	8	8	8	8	13	8	8	8	13	8	8	8	8
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	728	728	728	728	743	866	1,291	866	1,304	866	1,290	866	1,777
STATE LINE													
Single Use C.C.	255												
Livestock	197	197	197	197	197	224	392	212	376	217	217	251	2,029
Deer	28	28	28	28	61	28	28	28	61	28	28	28	28
Antelope	10	10	10	10	19	10	10	10	19	10	10	19	19
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	225	225	225	225	225	180	255	255	255	225	225	0	0
Total Allocation	460	460	460	460	502	442	610	505	711	470	780	298	2,076

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
SUSC WINTER													
Single Use C.C.	769												
Livestock	630	630	630	630	630	715	894	709	709	672	672	733	1,841
Deer	81	81	81	81	81	81	81	81	81	81	81	81	81
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	150	150	150	90	90	45	45	60	60	150	150	0	0
Total Allocation	861	861	861	801	801	841	1,020	850	850	903	903	814	1,922
WAH-WAH/LAWSON COVE													
Single Use C.C.	11,536												
Livestock	6,064	6,064	6,064	6,064	6,064	11,473	17,848	11,442	11,405	11,405	11,405	11,498	18,478
Deer	60	60	60	60	132	60	60	60	132	60	60	60	60
Antelope	60	60	60	60	107	60	60	60	107	60	60	60	60
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	225	225	225	90	90	60	60	45	45	225	225	0	0
Total Allocation	6,409	6,409	6,409	6,274	6,393	11,653	18,028	11,644	11,726	11,750	11,750	11,618	18,598
WELL													
Single Use C.C.	3,416												
Livestock	2,407	2,407	2,407	2,407	2,047	3,411	5,969	3,411	3,407	3,411	3,411	3,411	6,219
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	15	15	15	15	28	15	15	15	28	15	15	15	15
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	2,422	2,422	2,422	2,422	2,435	3,426	5,984	3,426	3,435	3,426	3,426	3,426	6,234
C CATEGORY													
AIRPORT*													
Single Use C.C.	188												
Livestock	150	150	150	150	150	188	188	188	200	188	188	188	977
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	150	150	150	150	150	188	188	188	200	188	188	188	977

	Existing	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
	Situation	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
AUSTIN													
Single Use C.C.	14												
Livestock	63	63	63	63	63	14	14	14	14	14	18	14	226
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	63	63	63	63	63	14	14	14	14	14	18	14	226
BERYL*													
Single Use C.C.	190												
Livestock	94	94	94	94	94	190	406	190	406	190	190	190	317
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	10	10	10	10	14	10	10	10	14	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	104	104	104	104	108	200	416	200	420	200	200	200	327
COUNTY LINE													
Single Use C.C.	29												
Livestock	198	198	198	198	198	28	93	9	88	28	28	28	494
Deer	24	24	24	24	24	24	24	24	24	24	24	24	24
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	222	222	222	222	222	52	117	24	112	52	52	52	518
CULVER SPRING													
Single Use C.C.	35												
Livestock	0	0	0	0	0	35	35	35	35	35	35	35	84
Deer	1	1	1	1	1	1	1	1	1	1	1	1	1
Antelope	1	1	1	1	3	1	1	1	3	1	1	1	1
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	2	2	2	2	4	37	37	37	39	37	37	37	86

	Existing	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
	Situation	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
DELVECCHIO*													
Single Use C.C.	90												
Livestock	80	80	80	80	80	90	115	90	115	90	90	90	115
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	10	10	10	10	19	10	10	10	19	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	90	90	90	90	99	100	125	100	134	100	100	100	125
FLAP TOP*													
Single Use C.C.	0												
Livestock	40	40	40	40	40	0	0	0	4	0	4	0	4
Deer	11	11	11	11	11	11	11	11	11	11	11	11	11
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	51	51	51	51	51	11	11	11	15	11	15	11	15
GOVERNMENT WELL													
Single Use C.C.	134												
Livestock	48	48	48	48	48	132	338	101	305	49	49	132	999
Deer	6	6	6	6	13	6	6	6	13	6	6	6	6
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	120	120	120	0	0	0	0	45	45	120	120	0	0
Total Allocation	174	174	174	54	61	138	344	152	363	175	175	138	1,005
HOLT MINE													
Single Use C.C.	232												
Livestock	188	188	188	188	188	220	501	208	489	186	186	231	1,057
Deer	15	15	15	15	15	15	15	15	15	15	15	15	15
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	120	120	120	60	60	30	30	60	60	120	120	0	0
Total Allocation	323	323	323	263	263	265	546	283	564	321	321	246	1,072

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
MEADOW VALLEY*													
Single Use C.C.	1												
Livestock	19	19	19	19	19	1	2	1	1	1	2	1	2
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	19	19	19	19	19	1	2	1	1	1	2	1	2
MODENA													
Single Use C.C.	68												
Livestock	346	346	346	346	346	68	385	68	383	68	85	68	801
Deer	5	5	5	5	11	5	5	5	11	5	5	5	5
Antelope	3	3	3	3	8	3	3	3	8	3	3	3	3
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	354	354	354	354	365	76	393	76	402	76	93	76	809
MODENA RESERVOIR													
Single Use C.C.	107												
Livestock	141	141	141	141	141	107	202	107	117	107	117	107	514
Deer	1	1	1	1	1	1	1	1	1	1	1	1	1
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	142	142	142	142	142	108	203	108	118	108	118	108	515
PINE GROVE													
Single Use C.C.	13												
Livestock	96	96	96	96	96	12	44	12	12	12	15	12	15
Deer	28	28	28	28	61	28	28	28	61	28	28	28	28
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	124	124	124	124	157	40	72	40	13	40	43	40	43

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
SMITHSON													
Single Use C.C.	711												
Livestock	602	602	602	602	602	711	800	711	800	711	711	711	1,054
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	10	10	10	10	19	10	10	10	19	10	10	10	10
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	612	612	612	612	621	721	810	721	819	721	721	721	1,064
SOUTH OF THE RAILROAD TRACKS*													
Single Use C.C.	105												
Livestock	48	48	48	48	48	105	131	105	105	105	105	105	168
Deer	0	0	0	0	0	0	0	0	0	0	0	0	0
Antelope	1	1	1	1	1	1	1	1	1	1	1	1	1
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	49	49	49	49	49	106	132	106	106	106	106	106	169
UVADA													
Single Use C.C.	178												
Livestock	29	29	29	29	29	160	341	160	341	157	157	163	1,017
Deer	34	34	34	34	34	34	34	34	34	34	34	34	34
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	30	30	30	15	15	15	15	15	15	30	30	0	0
Total Allocation	93	93	93	78	78	209	390	209	390	221	221	197	1,051
WINSOR*													
Single Use C.C.	0												
Livestock	15	15	15	15	15	0	0	0	0	0	0	0	24
Deer	4	4	4	4	4	4	4	4	4	4	4	4	4
Antelope	0	0	0	0	0	0	0	0	0	0	0	0	0
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	19	19	19	19	19	4	4	4	4	4	4	4	28

	Existing Situation	Current Alternative 1 No Action		Prior Alternative 2 Planning Recommendation		Current Alternative 3 Grazing Preference		Prior Alternative 4.1 Wildlife Subalternative		Current Alternative 4.2 Wild Horse Subalternative		Current Alternative 5 Livestock Maximization	
		Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term	Short Term	Long Term
WOOD WINTER													
Single Use C.C.	289												
Livestock	262	262	262	262	262	289	434	289	434	289	289	289	448
Deer	2	2	2	2	2	2	2	2	2	2	2	2	2
Antelope	9	9	9	9	17	9	9	9	17	9	9	9	9
Elk	0	0	0	0	0	0	0	0	0	0	0	0	0
Wild Horses	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Allocation	273	273	273	273	283	300	445	300	455	300	300	300	459
GRAND TOTALS													
Single Use C.C.													
Livestock	60,657	60,657	60,657	64,000	88,090	78,513	124,936	77,052	102,039	74,882	78,257	78,906	209,003
Deer	1,591	1,591	1,591	1,591	3,114	1,591	1,591	1,591	3,114	1,591	1,591	1,591	1,591
Antelope	755	755	755	755	1,353	755	752	755	1,393	755	755	755	755
Elk	317	317	317	317	1,053	317	317	317	1,053	317	317	317	317
Wild Horses	8,345	8,345	8,345	3,225	3,225	1,950	1,950	2,190	2,190	11,670	12,825	0	0
Total Allocation	71,665	71,665	71,665	69,888	96,835	83,126	126,546	81,905	109,749	89,215	93,725	81,569	211,666

*Allotments proposed for exchange or sale.

Table 4

Major Wildlife Conflicts and Their Resolution

	Major Conflicts		
	Overgrazing by Livestock and/or Wild Horses	Special Use Areas	Riparian Habitat
Current Situation	Mule deer-28 allotments overgrazed Antelope-20 allotments overgrazed	Mule deer-39 areas unprotected Elk-4 areas unprotected	Mule deer-117 acres unprotected Elk-89 acres unprotected
Alternative 1 No Action	Mule deer-0 of 28 resolved Antelope-0 of 20 resolved Elk-0 of 3 resolved	Mule deer-0 of 39 resolved Elk-0 of 4 resolved	Mule deer-0 of 117 acres resolved Elk-0 of 89 acres resolved
Alternative 2 Preferred Alternative	Mule deer-14 of 28 resolved Antelope-7 of 20 resolved Elk-3 of 3 resolved	Mule deer-15 of 39 resolved Elk-0 of 4 resolved	Mule deer-0 of 117 acres resolved Elk-0 of 89 acres resolved
Alternative 3 Grazing Preference	Mule deer-28 of 28 resolved Antelope-20 of 20 resolved Elk-3 of 3 resolved	Mule deer-18 of 39 resolved Elk-0 of 4 resolved	Mule deer-0 of 117 acres resolved Elk-0 of 89 acres resolved
Alternative 4.1 Resident Resources (Wildlife)	Mule deer-28 of 28 resolved Antelope-20 of 20 resolved Elk-3 of 3 resolved	Mule deer-39 of 39 resolved Elk-4 of 4 resolved	Mule deer-117 of 117 acres resolved Elk-89 of 89 acres resolved

Table 4 concluded

	Major Conflicts		
	Overgrazing by Livestock and/or Wild Horses	Special Use Areas	Riparian Habitat
Alternative 4.2 Resident Resource (Wild Horses)	Mule deer-28 of 28 resolved Antelope-20 of 20 resolved Elk-3 of 3 resolved	Mule deer-0 of 39 resolved Elk-0 of 4 resolved	Mule deer-0 of 117 acres resolved Elk-0 of 89 acres resolved
Alternative 5 Maximization	Mule deer-28 of 28 resolved Antelope-20 of 20 resolved Elk-3 of 3 resolved	Mule deer-0 of 39 resolved Elk-0 of 4 resolved	Mule deer-o of 117 acres resolved Wlk-0 of 89 acres resolved

Table 5
Treatment and Developments Proposed by Each Alternative

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
M Allotments												
Atchison Creek						3 springs 3 troughs 1 mile pipeline 9.5 miles fence				3 springs	CBBC*6,168 acres BBC 8,395 acres BD 1,199 acres PD 5,689 acres B 1,068 acres	5 springs 5 troughs 13.5 miles fence 1 mile pipeline
Blue Mountain											CBBC 1,670 acres PD 4,440 acres B 1,408 acres	
Bucket Ranch			PD 3,164 acres				PD 3,164 acres				CBBC 19,415 acres BD 166 acres PD 1,543 acres	8.5 miles fence 6.3 miles pipeline 3 troughs
Bucket Ranch Lambing			PD 1,598 acres				PD 1,597 acres				CBBC 997 acres	
Burn Knoll					BBC 1,760 acres	11.75 miles fence 1 spring 4 miles pipeline 3 troughs				1 spring	CBBC 3,380 acres BD 341 acres PD 6,944 acres B 6,694 acres	15 miles fence 1 spring 2 ponds 3 troughs 4 miles pipeline

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Butcher						2.5 miles pipeline 2 troughs					CBBC 54 acres BD 930 acres PD 1,205 acres	7.5 miles fence 2.5 miles pipeline
Cook						1 well 1 windmill 2 troughs 1.5 miles pipeline					CBBC 369 acres BD 1,111 acres PD 17,231 acres B 2,755 acres	1 well
Highrock					B 680 acres	1 well 2 tanks 14 miles pipeline 9 troughs 21 miles fence 4 cattle-guards		1 spring 5 guzzlers 0.4 mile pipeline			CBBC 4,715 acres PD 7,392 acres B 917 acres	25 miles fence 1 spring 1 well 2 troughs 1 storage tank 14 miles pipeline
Jackson AMP						6 miles pipeline 2 troughs					BD 1,231 acres PD 5,475 acres	7 miles fence 2 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Jackson Wash					CBD 1,440 acres	6 cattle-guards	PD 1,778 acres	4 RCG 1 storage tank			CBBC 8,717 acres BD 919 acres PD 7,108 acres B 534 acres	1 spring 3 troughs 5 miles fence 1 mile pipeline
Lawson Cove					See Wah Wah						CBBC 1,715 acres B 7,355 acres	9 windmills 20 miles fence 9 miles pipeline 3 troughs 1 reservoir
Lone Pine Spring					CBD 2,500 acres B 1,985 acres	6 troughs 1 spring 6.5 miles pipeline 1 well				1 spring	CBBC 22,447 acres BD 1,418 acres PD 1,116 acres B 646 acres	28.5 miles fence 2 springs 10.5 miles pipeline 5 troughs 1 well
Lund					S 1,500 acres	2 miles pipeline 2.5 miles fence 2 troughs		1 RCG			CBBC 12,497 acres BD 152 acres PD 10,346 acres B 1,943 acres	21 miles fence 7 miles pipeline 5 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
No Grazing B								1 spring			CBBC 6,260 acres PD 208 acres	1 spring 4 miles pipeline 2 troughs 15 miles fence
Pine Valley						2 reservoirs .75 mile pipelines 1 trough		1 RCG			CBBC 2,364 acres BD 878 acres B 109 acres	2 ponds .75 mile pipeline 1 trough 5.5 miles fence
Red Cove						.5 mile fence 10 miles pipeline 6 troughs		3 RCGs			CBBC 7,902 acres PD 3,881 acres B 5,319 acres	29 miles fence 10 miles pipeline 8 troughs
Rosebud											CBBC 1,999 acres	1 pump 4 miles pipeline 13 miles fence 5 troughs 2 springs
Shauntie					CBBC 1,340 acres	1 spring 4 troughs 1 windmill 4.5 miles pipeline 17 miles fence 1 well	CBBC 1,340 acres	1 spring 4 troughs 1 windmill 4.5 miles pipeline 17 miles fence		1 spring	CBBC 4,207 acres BD 219 acres PD 1,855 acres B 8,972 acres	5 troughs 6 miles pipeline 3 springs 3 windmills

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Sheep Creek			CBBC 1,844 acres			8.5 miles fence	CBBC 1,844 acres			1 spring	CBBC 9,173 acres BBC 105 acres BD 197 acres PD 2,604 acres	15 miles fence 2 springs 8 miles pipeline 3 troughs
Spanish George								2 RCGs			CBBC 3,767 acres BD 264 acres PD 2,717 acres	7 miles fence 3 troughs 1 windmill
Stateline						3.75 miles fence .25 mile pipeline 1 trough		3.75 miles fence .25 mile pipeline 1 trough			CBBC 9,471 acres BD 100 acres PD 372 acres	4 springs 4 miles fence 4 troughs .25 mile pipeline
SUSC Winter						1 seep 1 trough 1 tank					CBBC 4,541 acres BD 1,288 acres B 951 acres	3 wells
Wah Wah						15 miles pipeline 5 troughs 1 spring		6 RCGs		1 spring	CBBC 14,258 acres PD 1,706 acres B 14,711 acres	24 miles pipeline 17 troughs 29.5 miles fence 6 windmills

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Well						9 miles fence 7.5 miles pipeline 3 troughs					B 1,250 acres	12 miles fence 3 troughs 7 miles pipeline
C Allotments Airport						3 miles fence 1 well 1 windmill 1 trough		2 RCGs			BD 256 acres PD 4,503 acres B 130 acres	17 miles fence 2 wells
Austin											PD 1,128 acres	
Beryl					B 860 acres	1 mile pipeline 2 troughs 1.5 miles fence	B 860 acres	1 mile pipeline 2 troughs 1.5 miles fence			CBGC 283 acres PD 1,296 acres	4 miles fence 1 mile pipeline 2 troughs
County Line					BB 300 acres	2.5 miles fence	BB 300 acres	2.5 miles fence Rest for short term			SBC 1,169 acres BD 1,165 acres PD 5 acres B 132 acres	3 miles fence 1 well 3 miles pipeline 3 troughs 1 pump
Culver Spring						1 mile fence		1 mile fence			PD 286 acres B 137 acres	1 mile fence 1 spring 1 trough

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Delvecchio												
Flattop												
Government Well					PD 220 acres B 500 acres	3.75 miles fence	PD 220 acres B 500 acres	3.75 miles fence 1 RCG			CBBC 285 acres BD 196 acres PD 1,522 acres	3 windmills 6.75 miles fence 3 miles pipeline 2 troughs
Holt Mine					BBC 800 acres	.75 mile pipeline 1 trough 3.75 miles fence	BB 800 acres	.75 mile pipeline 1 trough 3.75 miles fence			CBBC 971 acres BD 72 acres PD 2,790 acres B 1,989 acres	8 miles fence .5 mile pipeline 1 trough 10 reservoirs
Meadow Valley												
Modena					B 400 acres BD 1,100 acres		B 400 acres BD 1,100 acres	1 spring			PD 759 acres B 993 acres	7 miles fence 2 miles pipeline 1 spring 2 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Modena Reservoir					BD 425 acres	1 well 1 windmill 1 trough 1 mile fence					BD 125 acres PD 2,446 acres	1 mile fence 1 well 1 trough
Pine Grove					CBBC 125 acres	6 miles fance						
Smithson						1.75 miles fence 1 well 1 windmill 1 trough		3.25 miles fence 1 well 1 windmill 1 trough			BD 165 acres PD 2,353 acres	5.5 miles fence 1 windmill
South of the Railroad Tracks											PD 281 acres	1 windmill 1 trough 2 miles fence
Uvada					CBBC 825 acres	1 well 1 windmill 1 trough	CBBC 825 acres	1 trough 1 well 1 windmill		1 well	CBBC 4,208 acres BD 101 acres PD 271 acres	
Winsor											BD 120 acres	1 mile fence 1 well
Wood Winter						.5 mile pipeline 1 trough		.5 mile pipeline			PD 2,241 acres	3 wells 1.5 mile pipeline 1 trough

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
1 Allotments												
Antelope Peak			CBBC 11,600 acres	6 troughs 2.5 miles fence 12 miles pipeline	CBBC 11,600 acres	6 troughs 2.5 miles fence 12 miles pipeline	CBBC 11,600 acres	6 troughs 2.5 miles fence 12 miles pipeline			CBBC 22,759 acres BD 1,202 acres PD 15,008 acres B 10,566 acres	48 miles fence 6 troughs 12 miles pipeline 2 windmills
Bagnall								2 RCGs			CBBC 922 acres BBC 206 acres PD 9,767 acres B 953 acres	2 windmills 5 miles pipeline 1 trough 3 windmills 35 miles fence
Beaver Lakes			CBBC 2,150 acres BD 2,000 acres	1 spring 4 miles pipeline 3 troughs	CBBC 2,150 acres BD 2,000 acres	1 spring 4 miles pipeline 3 troughs	CBBC 2,150 acres BD 2,000 acres	1 spring 4 miles pipeline 3 miles fence 3 troughs			CBBC 3,171 acres BD 2,088 acres PD 2,295 acres B 2,355 acres	40 miles fence 6 troughs 11 miles pipeline
Bennion Spring			CBB 2,360 acres	2 springs 3 miles pipeline 2 troughs 7.5 miles fence	CBB 2,360 acres	2 springs 3 miles pipeline 2 troughs 7.5 miles fence	CBB 2,360 acres	2 springs 3 miles pipeline 2 troughs 7.5 miles fence		2 springs	CBBC 13,647 acres BD 23 acres PD 7,764 acres	2 springs 3 miles pipeline 3 troughs 10 miles fence

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Buckhorn			BD 4,500 acres	4 troughs 7.5 miles pipeline 16.5 miles fence 3 cattle-guards	BD 4,500 acres	4 troughs 7.5 miles pipeline 16.5 miles fence 3 cattle-guards	BD 4,500 acres	7.5 miles pipeline 4 troughs 16.5 miles fence			CBBC 557 acres BD 406 acres PD 21,668 acres B 681 acres	14 miles pipeline 5 troughs 16 miles fence 1 reservoir 3 cattle-guards
Bull Spring				1 mile pipeline 1 trough 1 cattle-guard		1 mile pipeline 1 trough 1 cattle-guard		1 mile pipeline 1 trough 1 cattle-guard			CBBC 13,209 acres BBC 406 acres PD 5,910 acres B 923 acres	2 springs 2 troughs 3 wells 3 windmills 7 miles fence 1 mile pipeline 1 cattle-guard
Chokecherry				2 miles pipeline 1 trough		2 miles pipeline 1 trough		2 miles pipeline 1 trough			CBBC 4,342 acres BD 391 acres PD 2,897 acres	5 miles fence 1 trough 2 miles pipeline
Eight Mile Spring			CBBC 1,500 acres	1 spring 2 miles pipeline 1 trough	CBBC 1,500 acres	1 spring 2 miles pipeline 1 trough	CBBC 1,500 acres	1 spring 2 miles pipeline 1 trough		1 spring	CBBC 2,789 acres BD 851 acres B 158 acres	5.5 miles fence 1 trough 2 miles pipeline

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Frisco			CBBC 3,500 acres CBC 5,475 acres	8 miles pipeline 2 troughs	CBBC 3,500 acres CBC 5,475 acres	8 miles pipeline 2 troughs	CBBC 3,500 acres CB 5,475 acres	8 miles pipeline 2 troughs 2 RCGs		1 spring	CBBC 916 acres BBC 6,198 acres PU 17,155 acres B 4,891 acres	40 miles fence 10 miles pipeline 5 trough
Gold Spring			CBBC 1,440 acres	3 miles pipeline 4 troughs 2 springs 14.5 miles fence	CBBC 1,440 acres	3 miles pipeline 4 troughs 2 springs 14.5 miles fence	CBBC 1,440 acres	3 miles pipeline 2 springs 4 troughs 14 miles fence		3 springs	CBBC 10,002 acres BD 72 acres	1 spring 5.5 miles pipeline 3 troughs 8.5 miles fence
Hardpan				2.5 miles pipeline 1 trough		2.5 miles pipeline 1 trough		2.5 miles pipeline 1 trough 2 springs 2 RCGs			CBBC 7,999 acres B 14,579 acres	2 windmills 6 miles pipeline 5 troughs 6 miles fence
Haystack Mountain			CBBC 2,500 acres	1 reservoir 1 well 1 mile pipeline 1 trough 1 windmill	CBBC 2,500 acres	1 reservoir 1 well 1 mile pipeline 1 trough 1 windmill	CBBC 2,500 acres	1 reservoir 1 well 1 mile pipeline 1 trough 1 windmill		1 well	CBBC 611 acres BD 3,022 acres B 5,087 acres	14 miles fence 2 wells 2 troughs
Hebron			CBBC 1,200 acres BD 1,200 acres	1 reservoir	CBBC 1,200 acres BD 1,200 acres	1 reservoir	CBBC 1,200 acres BD 1,200 acres	1 reservoir		1 reservoir	CBBC 988 acres BD 584 acres	10 miles fence 3 miles pipeline 2 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Indian Creek			CBBC 3,415 acres BD 500 acres	5 miles fence	CBBC 3,415 acres BD 500 acres	5 miles fence		2 springs 2 RCGs			CBBC 13,834 acres BD 635 acres PD 5,107 acres	14 miles fence 2 springs 5 miles fence 4 troughs
Indian Peak			CBBC 1,200 acres PD 1,200 acres CBBC 10,549 acres	21 miles pipeline 9 troughs 4 springs 30 miles fence	CBBC 1,200 acres PD 1,200 acres	21 miles pipeline 9 troughs 4 springs 30 miles fence	CBBC 11,749 acres PD 1,200 acres	9 troughs 21 miles pipeline 4 springs 30 miles fence		4 springs	CBBC 37,649 acres BBC 9,512 acres BD 5,106 acres PD 17,970 acres B 1,186 acres	5 springs 19.5 miles pipeline 30 miles fence 10 troughs 3 windmills
Jockeys			BD 8,700 acres B 300 acres	3 springs 10 miles pipelie 6 trough 5 fence	CBB 8,700 acres B 300 acres	3 springs 10 miles pipeline 6 troughs 5 miles fence	CBB 8,700 acres B 300 acres	3 springs 10 miles pipeline 6 troughs 5 miles fence		3 springs	CBBC 23,484 acres BD 2,465 acres PD 1,178 acres B 1,565 acres	18 miles fence 1.5 miles pipeline 2 windmills 2 troughs 4 springs
Johns			CBBC 1,000 acres	11.5 miles fence	CBBC 1,000 acres	11.5 miles fence	CBBC 1,000 acres	11.5 miles fence 1 trough			CBBC 4,565 acres BD 49 acres	13.5 miles fence 2 springs 2 miles pipeline 2 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Klin Spring			CRBC 4,000 acres	2 springs 7.5 miles pipeline 3 troughs 3 miles fence	CRBC 4,000 acres	2 springs 7.5 miles pipeline 3 troughs 3 miles fence	CRBC 4,000 acres	2 springs 7 troughs 7.5 miles pipeline 3 miles fence		1 spring	CRBC 9,422 acres CSC 206 acres PD 1,946 acres B 4,780 acres	40 miles fence 11 miles pipeline 6 troughs
Matheson			RBC 200 acres	2.5 miles pipeline 2 troughs 2 miles fence 1 cattle guard	RBC 200 acres	2.5 miles pipeline 2 troughs 2 miles fence		2 RCDs			RD 120 acres PD 1,892 acres	4 miles fence 2.5 miles pipeline 3 troughs 1 windmill
Milford Cattle				2 miles pipeline 1 trough		2 miles pipeline 1 trough		2 miles pipeline 1 trough			RD 18 acres PD 3,515 acres B 181 acres	13.5 miles fence 4.5 miles pipeline 1 trough
Modena Canyon			CRBC 3,500 acres	1 spring 4.5 miles pipeline 2 troughs 1 reservoir 8 miles fence	CRBC 3,500 acres	1 spring 4.5 miles pipeline 2 troughs 1 reservoir 8 miles fence	CRBC 3,500 acres	1 spring 1 reservoir 2 troughs 1.5 miles pipeline 8 miles fence		1 spring	CRBC 1,979 acres PD 129 acres	27.5 miles fence 8 miles pipeline 4 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Mountain Home							CBBC 1,500 acres	4 RCBs 1 spring		9 springs	CBBC 19,899 acres BBC 731 acres BD 2,650 acres PD 231 acres	57 miles fence 9 miles pipeline 9 troughs
Mountain Spring			CBB 1,685 acres	1 spring 7.75 miles pipeline 4 troughs 1 cattle-guard 7.5 miles fence	CBB 1,685 acres	1 spring 7.75 miles pipeline 4 troughs 2 cattle-guards 7.5 miles fence	CBBC 1,685 acres	3 springs 3 troughs 7.75 miles pipeline 2 cattle-guards 7.5 miles fence		1 spring	CBBC 16,347 acres BD 517 acres PD 2,969 acres B 2,088 acres	25 miles fence 9 miles pipeline 6 troughs
Mt. Elinor			CBBC 1,300 acres	4.5 miles pipeline 1 spring 2 troughs	CBBC 1,700 acres	4.5 miles pipeline 1 spring 2 troughs	CBBC 1,300 acres	4.5 miles pipeline 2 troughs 1 spring			CBBC 3,503 acres BD 3 acres PD 1,296 acres	4.5 miles pipeline 1 trough
Rose Valley			CBBC 400 acres B 200 acres	4.25 miles fence 2.5 miles pipeline	CBBC 400 acres B 200 acres	4.25 miles fence 2.5 miles pipeline	CBBC 400 acres B 200 acres	4.25 miles fence 2.5 miles pipeline 3 RCBs			CBBC 3,217 acres BD 850 acres PD 1,335 acres	25 miles fence 10.5 miles pipeline 1 trough 1 windmills

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Savy West			CSBC 3,800 acres SD 2,200 acres	2 wells 2 windmills 2 troughs 2 reservoirs 8 miles fence 2.5 miles pipeline	CSBC 3,800 acres SD 2,200 acres	2 wells 2 troughs 2 reservoirs 8 miles fence 2.5 miles pipeline	CSBC 3,800 acres SD 3,200 acres	2 wells 2 windmills 2 troughs 2 reservoirs 8 miles fence 2.5 miles pipeline		1 well 1 reservoir	CSBC 9,584 acres SD 13,540 acres SB 14,900 acres	25 miles fence 2 wells 9 miles pipeline 9 troughs
Sewing Machine								2 RCGs handplant blacksage rest 10 yrs			CSBC 2,796 acres SC 3,520 acres	9 miles fence 1 windmill 1 trough 2 RCGs
Sheep Spring			CSBC 2,500 acres	1 spring 2 miles pipeline 2 troughs 8 miles fence	CSBC 2,500 acres	1 spring 2 miles pipeline 2 troughs 8 miles fence	CSBC 2,500 acres	1 spring 2 miles pipeline 2 troughs 8 miles fence		1 spring	CSBC 12,029 acres SD 932 acres	20 miles fence 4 miles pipeline 3 troughs
Smith Jones			SBC 500 acres	2.5 miles fence	SBC 500 acres	2.5 miles fence	SB 500 acres	2.5 miles fence			CSBC 1,868 acres SD 1,102 acres PD* 90 acres	7 miles fence 2 wells 3 miles pipeline 3 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Tilly Creek			CBBC 1,000 acres	1 spring 4.5 miles pipeline 2 troughs	CBBC 1,000 acres BD 800 acres	1 spring 4.5 miles pipeline 2 troughs				1 spring	CBBC 2,660 acres BD 3,092 acres PD 947 acres B 383 acres	9.5 miles pipeline 9.5 miles fence 5 troughs
Water Hollow			BBC 6,970 acres	2.5 miles pipeline 1 trough 5.5 miles fence	BBC 6,970 acres	2.5 miles pipeline 1 trough 5.5 miles fence	BD 4,190 acres	2.5 miles pipeline 1 trough 5.5 miles fence			CBBC 7,872 acres BD 1,349 acres PD 15,767 acres B 617 acres	4 miles fence 2.5 miles pipeline 1 trough
Willow Creek			CBBC 1,000 acres B 2,000 acres	11 miles pipeline 2 troughs 8 miles fence	CBBC 1,000 acres B 2,000 acres	11 miles pipeline 2 troughs 8 miles fence	CBBC 1,208 acres B 2,000 acres	11 miles pipeline 2 troughs 8 miles fence			CBBC 10,196 acres BBC 1,448 acres BD 753 acres PD 9,555 acres B 12,026 acres	32 miles fence 11 miles pipeline 6 troughs

Allotment	Alternative 1		Alternative 2		Alternative 3		Alternative 4.1		Alternative 4.2		Alternative 5	
	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities	Treatment	Facilities
Grand Totals			CBBC 58,549 acres BD 10,400 acres CBB 11,060 acres CBC 5,475 acres B 500 acres PD 5,962 acres BBC 7,670 acres 99,616 acres	75 troughs 5 reservoirs 152 miles fence 131 miles pipeline 20 springs 7 cattleguards 3 wells 3 windmills	CBBC 49,295 acres BD 12,725 acres CBB 12,745 acres CBC 5,475 acres B 6,925 acres PD 1,420 acres BBC 10,230 acres S 1,500 acres CBD 3,940 acres BB 300 acres 104,555 acres	122 troughs 7 reservoirs 250 miles fence 216 miles pipeline 27 springs 14 cattleguards 10 wells 6 windmills 3 tanks	CBBC 57,216 acres BD 10,900 acres CBB 2,360 acres PD 7,959 acres B 4,260 acres BB 6,890 acres CBC 3,500 acres CBD 8,700 acres CB 5,475 acres 107,260 acres	70 troughs 165 miles fence 130 miles pipeline 44 RCGs 30 springs 3 cattleguards 5 wells 6 windmills 1 storage tank		36 springs 3 wells 2 reservoirs	CBBC 379,470 acres BBC 27,225 acres SBC 1,480 acres BD 54,662 acres PD 284,353 acres B 139,343 acres 868,533 acres	922 miles fence 204 troughs 325 miles pipeline 36 windmills 8 reservoirs 4 cattleguards 51 springs 20 wells 1 storage tank 1 pump

*CBBC - Chain-Burn-Broadcast-Chain; BBC - Burn-Broadcast-Chain; BB - Burn-Broadcast; BD - Burn-Drill; B - Burn; PD - Plow-Drill; CBD - Chain-Burn-Drill; S - Spray; SBC - Spray-Broadcast-Chain; CBB - Chain-Burn-Broadcast

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